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August 5, 2024

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, Oregon 97301-3398

**Re: UG 490 – NW Natural’s Request for a General Rate Revision  
Response to Bench Request - UPDATE**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), hereby provides an update to Administrative Law Judge Spruce’s March 7, 2024 Bench Request.

Correspondence relating to this filing should be directed to:

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Sincerely,

NW NATURAL

*/s/ Eric W. Nelsen*

Eric W. Nelsen  
Senior Regulatory Attorney  
OSB# 192566

Enclosure

**NW Natural**

**Residential**

Rate Adjustment	Filing Date (anticipated or actual)	Rate Impact in \$	Rate impact in %	Rate effective date	Schedule #
					Schedule P - PGA Forecast, Schedule 162 - PGA Gas Cost Differences, Schedule 168 - Curtailment and Entitlement Revenue, Schedule 172 - Intervenor Funding, Schedule 177 - CAT Deferral & Incremental, Schedule 178 - Regulatory Rate Adjustment, Schedule 180 - TSA Security Directive (O&M) Schedule 181 - Oregon Regulatory Fee, Schedule 183 - SRRM Adjustment, Schedule 188 - Industrial DSM, Schedule 187 - Mist Recall Schedule 189 - TSA Security Directive (CoS), Schedule 190 - Decoupling, Schedule 195 - WARM, Schedule 198 - RNG Adj Mechanism, Schedule 196 - Transportation EE [1],
PGA and Other Rate Filings	9/15/2024	\$ (30,075,365)	-3.6%	11/1/2024	AWEC Deferral [2]
Compliance Filing (Incl. PGA)	10/30/2024	\$ 65,145,088	7.0%	11/1/2024	UG 490

**Overall Impact**

Rate Adjustment	Filing Date (anticipated or actual)	Rate Impact in \$	Rate impact in %	Rate effective date	Schedule #
					Schedule P - PGA Forecast, Schedule 162 - PGA Gas Cost Differences, Schedule 168 - Curtailment and Entitlement Revenue, Schedule 172 - Intervenor Funding, Schedule 177 - CAT Deferral & Incremental, Schedule 178 - Regulatory Rate Adjustment, Schedule 180 - TSA Security Directive (O&M) Schedule 181 - Oregon Regulatory Fee, Schedule 183 - SRRM Adjustment, Schedule 188 - Industrial DSM, Schedule 187 - Mist Recall Schedule 189 - TSA Security Directive (CoS), Schedule 190 - Decoupling, Schedule 195 - WARM, Schedule 198 - RNG Adj Mechanism, Schedule 196 - Transportation EE [1],
PGA and Other Rate Filings	9/15/2024	\$ (29,859,395)	-3.2%	11/1/2024	AWEC Deferral [2]
Compliance Filing (Incl. PGA)	10/30/2024	\$ 65,145,088	7.0%	11/1/2024	UG 490

[1] NW Natural's Advice No. 23-29, New Schedules 169 and 361, Energy Efficiency Program for Transportation Customers, ADV 1582. Filed Dec. 18, 2023 (available at: <https://edocs.puc.state.or.us/efdocs/UAA/uaa325641023.pdf>).

[2] On December 27, 2023 AWEC filed an Application for an accounting order requiring NWN to defer costs and expenses associated with the Climate Protection Plan ("CPP") for transportation and special contract customers due to the invalidation of the CPP on December 20, 2023. The effect of this deferral has been included in Schedule P, 171 and 198.

**NW Natural**  
**Oregon Jurisdictional Rate Case**  
**Test Year Twelve Months Ended October 31, 2025**  
**Proposed Incremental Revenue Requirement Allocation by Rate Schedule - Revenue Requirement Effects**  
**UG 490 - Bench Request**

**Stipulated UG 490 Revenue Requirement Impacts**

Impacts of UG 490 Revenue Requirement items, including the application of the Plant EDIT Amortization Credit

Line No.	Rate Schedule	Impact to -->		Revenue Requirement		Plant EDIT Credits		Total: Rev. Req. Items		PGA and Other Filings		Margin Revenue at Proposed Rates	Total Revenue at Proposed Rates	Combined Effects			
		Margin Revenue at Present Rates	Total Revenue at Present Rates	Margin Increase (\$)	Margin Increase (%)	Margin Increase (\$)	Margin decrease (%)	Margin Increase (\$)	Margin Increase (%)	Revenue Change (\$)	Revenue Change (%)			Total Revenue Increase (\$)	Margin Revenue Increase (%)	Total Revenue Increase (%)	Average Bill Increase (%)
		A	B	(1)	D	(2)	F	G = C+E	H	I	J			K=A+G	L=B+G+I	M=G+I	N
1	02R	\$ 360,714,887	\$ 584,697,334	\$ 67,850,271	18.8%	\$ (2,993,832)	-0.8%	\$ 64,856,439	18.0%	\$ (20,924,511)	-3.6%	\$ 425,571,326	\$ 628,629,262	\$ 43,931,928	18.0%	7.5%	7.0%
2	02R - SF	\$ 319,667,295	\$ 518,161,633	\$ 61,273,933	19.2%	\$ (2,659,886)	-0.8%	\$ 58,614,048	18.3%	\$ (18,590,489)	-3.6%	\$ 377,143,387	\$ 558,185,192	\$ 38,932,689	18.0%	7.7%	7.3%
3	02R - MF	\$ 39,289,450	\$ 63,685,856	\$ 5,847,302	14.9%	\$ (326,940)	-0.8%	\$ 5,520,362	14.1%	\$ (2,285,051)	-3.6%	\$ 46,353,682	\$ 66,921,168	\$ 4,785,112	18.0%	5.1%	4.8%
4	02R - NP SF	\$ 1,338,204	\$ 2,169,149	\$ 568,957	42.5%	\$ (5,353)	-0.4%	\$ 563,604	42.1%	\$ (37,413)	-1.7%	\$ 1,578,813	\$ 2,695,340	\$ 162,982	18.0%	24.3%	N/A
5	02R - NP MF	\$ 419,939	\$ 680,695	\$ 160,079	38.1%	\$ (1,654)	-0.4%	\$ 158,425	37.7%	\$ (11,559)	-1.7%	\$ 495,443	\$ 827,561	\$ 51,145	18.0%	21.6%	N/A
6	03C	\$ 113,389,442	\$ 207,588,681	\$ 27,613,303	24.4%	\$ (1,217,814)	-1.1%	\$ 26,395,489	23.3%	\$ (5,637,207)	-2.7%	\$ 139,784,931	\$ 228,346,963	\$ 20,758,282	23.3%	10.0%	10.1%
7	03I	\$ 2,405,057	\$ 5,088,420	\$ 202,759	8.4%	\$ (8,931)	-0.4%	\$ 193,828	8.1%	\$ (76,913)	-1.5%	\$ 2,598,884	\$ 5,205,334	\$ 116,915	8.1%	2.3%	2.1%
8	27R	\$ 593,328	\$ 1,051,370	\$ 144,488	24.4%	\$ (6,375)	-1.1%	\$ 138,113	23.3%	\$ (27,570)	-2.6%	\$ 731,441	\$ 1,161,913	\$ 110,543	23.3%	10.5%	9.7%
9	31CSF	\$ 10,045,606	\$ 22,561,649	\$ 846,802	8.4%	\$ (37,320)	-0.4%	\$ 809,482	8.1%	\$ (448,772)	-2.0%	\$ 10,855,089	\$ 22,922,359	\$ 360,710	8.1%	1.6%	1.4%
10	31CTF	\$ 1,140,610	\$ 1,133,412	\$ 96,148	8.4%	\$ (4,241)	-0.4%	\$ 91,908	8.1%	\$ (29,109)	-2.6%	\$ 1,232,517	\$ 1,196,211	\$ 62,799	8.1%	5.5%	5.1%
11	31ISF	\$ 3,467,751	\$ 9,636,781	\$ 292,337	8.4%	\$ (12,929)	-0.4%	\$ 279,408	8.1%	\$ (131,027)	-1.4%	\$ 3,747,160	\$ 9,785,162	\$ 148,381	8.1%	1.5%	1.3%
12	31ITF	\$ 156,930	\$ 155,940	\$ 13,228	8.4%	\$ (585)	-0.4%	\$ 12,644	8.1%	\$ (4,859)	-3.1%	\$ 169,574	\$ 163,724	\$ 7,785	8.1%	5.0%	4.8%
13	32CSF	\$ 14,016,743	\$ 39,678,850	\$ 1,050,097	7.5%	\$ (46,553)	-0.3%	\$ 1,003,544	7.2%	\$ (558,832)	-1.4%	\$ 15,020,287	\$ 40,123,561	\$ 444,711	7.2%	1.1%	1.0%
14	32ISF	\$ 3,667,040	\$ 14,798,305	\$ 188,958	5.2%	\$ (8,318)	-0.2%	\$ 180,640	4.9%	\$ (156,854)	-1.1%	\$ 3,847,680	\$ 14,822,090	\$ 23,786	4.9%	0.2%	0.0%
15	32CTF	\$ 994,454	\$ 988,178	\$ 74,524	7.5%	\$ (3,297)	-0.3%	\$ 71,227	7.2%	\$ (29,621)	-3.0%	\$ 1,065,681	\$ 1,029,784	\$ 41,606	7.2%	4.2%	4.9%
16	32ITF	\$ 6,714,797	\$ 6,672,424	\$ 345,865	5.2%	\$ (15,304)	-0.2%	\$ 330,562	4.9%	\$ (395,700)	-5.9%	\$ 7,045,359	\$ 6,607,286	\$ (65,138)	4.9%	-1.0%	1.0%
17	32CSI	\$ 2,566,247	\$ 13,398,486	\$ 192,303	7.5%	\$ (8,555)	-0.3%	\$ 183,748	7.2%	\$ (331,467)	-2.5%	\$ 2,749,995	\$ 13,250,767	\$ (147,719)	7.2%	-1.1%	-0.6%
18	32ISI	\$ 2,990,958	\$ 16,774,985	\$ 154,004	5.1%	\$ (6,806)	-0.2%	\$ 147,198	4.9%	\$ (352,559)	-2.1%	\$ 3,138,156	\$ 16,569,624	\$ (205,361)	4.9%	-1.2%	-0.9%
19	32CTI	\$ 515,000	\$ 511,750	\$ 38,567	7.5%	\$ (1,715)	-0.3%	\$ 36,851	7.2%	\$ (30,839)	-6.0%	\$ 551,851	\$ 517,762	\$ 6,013	7.2%	1.2%	-0.6%
20	32ITI	\$ 5,539,411	\$ 5,504,455	\$ 285,767	5.2%	\$ (12,364)	-0.2%	\$ 273,403	4.9%	\$ (723,555)	-13.1%	\$ 5,812,813	\$ 5,054,303	\$ (450,152)	4.9%	-8.2%	-2.5%
21	33T	\$ 0	\$ 0	\$ 0	0.0%	\$ 0	0.0%	\$ 0	0.0%	\$ -	0.0%	\$ 0	\$ 0	\$ 0	0.0%	0.0%	0.5%
<b>Total</b>		<b>\$ 528,918,261</b>	<b>\$ 930,241,019</b>	<b>\$ 99,389,421</b>	<b>18.8%</b>	<b>\$ (4,384,938)</b>	<b>-0.8%</b>	<b>\$ 95,004,483</b>	<b>18.0%</b>	<b>\$ (29,859,395)</b>	<b>-3.21%</b>	<b>\$ 623,922,744</b>	<b>\$ 995,386,108</b>	<b>\$ 65,145,088</b>	<b>17.96%</b>	<b>7.00%</b>	<b>(5)</b>

NOTE (1): Revenue Requirement spread based on the Company's proposal described in Testimony NW Natural/1800, Wyman.

NOTE (2): Plant excess deferred income taxes (EDIT) amortization credit spread to all rate schedules based on the revenue requirement spread noted above.

NOTE (3): 02R indicates the entire Residential rate class. Below it are the four proposed Residential sub-classes that make-up the class-wide total. They are as follows. 02R - SF : Existing Single-Family; 02R - MF : Existing Multi-Family; 02R - NP SF: New Premise Single-Family; 02R - NP MF: New Premise Multi-Family.

NOTE (4): The proposed margin revenue increase is based on volumetric billing rates rounded to the fifth decimal as necessitated by the Company's tariff. Therefore, there may be a small discrepancy with the indicated revenue requirement.

NOTE (5): The average customer bill percentage impact figure calculation excludes pipeline capacity charges for RS 31 and RS 32 rate classes, and thus the bill rate impacts for these schedules are overstated.

NOTE (6): Revenue change is based on current (2023-24) revenues from the Purchased Gas Adjustment filings and the newly forecasted revenue for 11/1/2024