

April 28, 2022

NWN OPUC Advice No. 22-01B

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: ADV 1373 / UG 436 / NWN OPUC Advice 22-01B – Compliance Filing

NW Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff P.U.C. Or. 25, stated to become effective on May 1, 2022.

Second Revision of Sheet R-1	Schedule R	Arrearage Management Program
Second Revision of Sheet R-2	Schedule R	Arrearage Management Program

This filing is made in compliance with Commission Order No. 22-106 issued in this docket.

Purpose

The purpose of this compliance filing is to reflect changes to NW Natural's tariff Schedule R approved in Order No. 22-106. In the Order the Commission approved the Company's proposed tariff changes in Advice 22-01 with the following conditions.

- Increase the Program participation cap to \$1,500;
- Increase the Instant Grant option to \$600;
- Increase the Low-Income Instant Grant Option (LIIGO) to \$1,500;
- Establish a self-certified income qualifier for all proposed Schedule R programs at 300 percent of the Federal Poverty Level (FPL) and below (effective upon a second compliance filing no later than May 1, 2022);
- Establish a self-certified income qualifier for the LIIGO that allows customers to self-certify household income at less than or equal to 60 percent State Median Income (SMI) to receive up to \$1,500 toward their arrearage balance without a matching requirement or proof of crisis (effective upon a second compliance filing no later than May 1, 2022); and,
- Supplement existing quarterly reports with AMP participation data reported by month and 5-digit zip code.

The enclosed Schedule R tariff sheets reflect the changes required by the approval of bullets four and five.

The compliance filing to implement bullets one through three was provided in Advice 22-01A on March 23, 2022. The Company notes that the reporting requirement in bullet six is already addressed in Schedule R under Special Condition 4. Special Condition 4 includes reporting required under Order No. 20-401, which includes zip code.

Tariff Changes in Compliance with Commission Decision

The enclosed proposed changes to tariff Schedule R implement the following changes adopted by the Commission in Order No. 22-106:

- Establish a self-certified income qualifier for all proposed Schedule R programs at 300 percent of the Federal Poverty Level (FPL) and below.
- Establish a self-certified income qualifier for the LIIGO that allows customers to self-certify household income at less than or equal to 60 percent SMI to receive up to \$1,500 toward their arrearage balance without a matching requirement or proof of crisis.

Conclusion

NW Natural respectfully request that the tariff sheet revisions enclosed, which have been revised in compliance Order No. 22-106, be approved with an effective date of May 1, 2022.

Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural Rates & Regulatory Affairs
250 SW Taylor Street
Portland, OR 97204
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Respectfully submitted,

/s/ Natasha Siores

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NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Second Revision of Sheet R-1
Cancels First Revision of Sheet R-1

SCHEDULE R ARREARAGE MANAGEMENT PROGRAM

PURPOSE:

The purpose of this schedule is to implement the residential Arrearage Management Program (AMP) consistent with Commission Order No. 20-401 and Order No. 22-106. Order No. 20-401 directed Utilities to establish a program to identify and manage residential customer arrearages associated with the COVID-19 pandemic to proactively assist residential customers prior to resuming disconnections and prevent bad debt accumulating on utility accounts. Order No. 22-106 directed NW Natural to focus the AMP on low-income, residential customers. (N)

The Program was established to identify and waive residential arrearages at an initial total amount of \$6,167,000, not to be increased without prior Commission approval. This amount represents one percent (1%) of the Company's 2019 Oregon retail revenues. In 2022, an additional \$3,083,500 in Program funding was approved by the Commission, of which \$750,000 will be used solely for the Instant Grant "Option b" pertaining to past-due customers who have received energy assistance since January 1, 2019. (N)

APPLICABLE:

To all income-eligible Residential Customers with a past due balance taking service under Rate Schedule 2 of this Tariff. To qualify as income-eligible for this Program, customers can self-certify as having a household income level that is at or below 300% of the Federal Poverty Level. Self-certification of income eligibility will be accepted by the Customer Contact Center (CCC) with no documentation required. (T)

ENROLLMENT:

Eligible residential Customers may enroll in an AMP option by calling the CCC, Monday through Friday, 7 a.m. to 6 p.m. at 800-422-4012 or 503-226-4211. (T)

AMP OPTIONS:

The Program is intended to address long-term arrearage reduction and prevent disconnection due to non-payment. It also serves as an additional resource to supplement various sources of low-income energy assistance for qualified customers. The following options are available: (T)

Instant Grant Options

1. An option that offers a one-time grant of up to \$600 (but not to exceed the past due or full account balance) for the residential customer with a smaller past due or full account balance who expresses economic hardship. (T)
2. A secondary Instant Grant option of up to \$1,500 in which NW Natural will identify past-due customers who have received energy assistance since January 1, 2019 and will proactively apply funds to those accounts to bring them current via auto-enrollment in the AMP. Proactive auto-enrollments may occur periodically based on customer need and availability of funds. Customers may qualify for this grant option by self-certifying as having a household income level that is at or below 60% of Oregon Median Income (OMI). Self-certification of income eligibility will be accepted by the CCC with no documentation required. (N)
 - i. NW Natural will send each customer a letter informing them of AMP funds being applied to their account, providing references for other available energy assistance and asking customers to contact the Company with any questions. (T)
 - ii. Grant funds will appear on the customer's next bill as "Instant Grant." (T)

(continue to Sheet R-2)

(K) Transferred to Sheet R-2

Issued April 28, 2022
NWN OPUC Advice No. 22-01B

Effective with service on
and after May 1, 2022

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Second Revision of Sheet R-2
Cancels First Revision of Sheet R-2

SCHEDULE R ARREARAGE MANAGEMENT PROGRAM

50/50 Matching Grant Option

1. A payment match option that offers up to a \$600 matching grant in the form of a credit applied to the account and eliminates a past due or full account balance.
2. Grant will appear on the customer's next bill as "50/50 Grant."

(T) (M)
(T) |
(T) (M)

Time Payment Arrangement (TPA) with Matching Grant Option

1. An option that offers a TPA in which the residential customer makes a payment each month and receives a matching grant payment to reduce the balance at the time the customer's TPA payment posts.
2. The customer's grant is equal to 50% of the total account balance with matching grant payments divided up in a number equal to the number of TPA payments required by the TPA term.
 - a. Grant not to exceed the \$1,500 Program limit or the balance of that limit still available to the customer under the AMP, whichever is less.
3. Eliminates a past due balance and brings the full account balance current when the plan is completed.
4. Grant payments will appear on the customer's bill as "Arrearage Management Plan Grant."

(T)
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(T)
(T)

SPECIAL CONDITIONS

1. Residential customers can participate in the AMP in any combination of options up to a maximum contribution from the Program limit of up to \$1,500.
2. Residential customers that express (1) no means to make payment(s) and (2) are suffering additional financial hardship due to crises above and beyond those commonly experienced due to the COVID-19 pandemic, including, but not limited to death, chronic illness or major injury in the household; or ongoing medical complications from COVID-19, may receive Instant Grants up to \$1,000 without a matching payment. Such customers may not exceed the \$1,500 Program limit.
3. The Company will defer and seek recovery of all associated program costs not otherwise included in rates in accordance with Commission Order No. 20-401 and Order No. 20-380.
4. In addition to the reporting requirements outlined in Commission Order No. 20-401, the Company will provide quarterly reporting on the amount of assistance that has been provided and the number of customers enrolled in the Program, and any additional reporting may be provided as determined by the Commission.

TERM

This program shall continue through October 1, 2022, or until the Company reaches the spending limit, or until the Commission closes the program.

GENERAL TERMS:

This Schedule is governed by its terms, the General Rules and Regulations contained in this Tariff, any other Schedules that by their terms or by the terms of this Schedule apply to service under this Schedule, and by all rules and regulations prescribed by regulatory authorities, as amended from time to time.

(M) Transferred from Sheet R-1

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