



February 28, 2022

VIA ELECTRONIC FILING

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

Re: UM 2211—NW Natural's Interim Action Plan

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), provides its interim action proposal to implement HB 2475 programs and activities as requested by Commission Staff's Interim Action Proposal in this docket.

Currently, NW Natural's action plan for implementing HB 2475 programs and activities include: i) proposing revisions to its Arrearage Management Program (AMP); ii) developing a low-income bill discount program to be in place by the next heating season; iii) conducting a Low-Income Needs Assessment (LINA); and iv) developing a long-term low-income rate program that is informed by the LINA and Staff's HB 2475 investigation in docket UM 2211. We note that additional activities may be added to this plan as we continue to learn more about useful programs and tools through the UM 2211 investigation.

AMP Enhancements

On February 17, 2022, NW Natural filed tariff revisions to its AMP seeking additional funding for the program and to add an additional grant type to serve income-eligible customers. Our AMP proposal meets Commission Staff's HB 2475 Interim Action Framework that calls for natural gas companies to provide enhanced bill assistance for low-income customers to address winter heating balances before interim differential rate programs are put in place. In addition, NW Natural's AMP communications focus on community outreach through relationships built with organizations, agencies, and other partners with close ties to low-income, energy-burdened, and hard-to-reach customers.

A stakeholder workshop on NW Natural's AMP proposal will be held on March 4, 2022.

Interim Low-Income Bill Discount Program

NW Natural is in the process of developing a low-income bill discount program that will be filed by April 2022, and, if approved, will be put in place for the 2022-2023 heating season. Through the program, NW Natural intends to direct assistance to its most energy-burdened customers in a manner that has minimal barriers for participation and is easy to access. In addition, the Company hopes to coordinate the parameters of its program with those of the electric utilities that also serve our customers to further accommodate an efficient experience for customers to obtain energy assistance. NW Natural looks forward to working with stakeholders and Staff in developing and implementing this program.

LINA

NW Natural is working with a third-party consultant to perform a LINA to better understand the needs of our customers and effective ways to serve and assist them. The study will help the Company better understand the income constraints and energy burden of our customers, which will inform our understanding of how to design long-term low-income rate programs. The LINA will be completed by mid-year.

Long-term low-income rate program

Through the completion of the LINA, as well as learnings from Staff's UM 2211 investigation and our upcoming interim low-income bill discount program, NW Natural hopes to be well-positioned to develop a potentially comprehensive long-term low-income rate program that meets the needs of its most energy-burdened customers and the expectations of HB 2475. NW Natural expects that identification and development of the long-term low-income rate program will begin in 2023.

Finally, NW Natural is pleased to announce the establishment of our Community and Equity Advisory Group (CEAG) in 2022, which will include a broad panel of representatives from community-based organizations who can share their expertise and knowledge of the communities they serve. We look forward to having the CEAG as a resource to assist the implementation of the elements of our action plan.

NW Natural looks forward to developing the programs and rates contemplated by HB 2475 to better serve and assist energy-burdened customers and appreciates the opportunity to continue participating in the UM 2211 proceeding.

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

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