Oregon Public Utility Commission

e-FILING REPORT COVER SHEET

COMPANY NAME: NW Natural

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION? ☐ No ☒ Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

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Report is required by: ☒ OAR 860-150-0600
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RNG, Renewable Natural Gas,

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June 30, 2026

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

Re: RG 99—2025 Annual Renewable Natural Gas Compliance Report

In accordance with Oregon Administrative Rule 860-150-0600(1), Northwest Natural Gas Company, dba NW Natural, submits herewith its annual Renewable Natural Gas Compliance Report for calendar year 2025. **The information in the enclosed report includes commercially sensitive information considered to be a trade secret and is provided as confidential under General Protective Order No. 23-132.**

Please direct any questions regarding this report to me at rebecca.trujillo@nwnatural.com or (503) 610-7326 with copies to the following:

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Respectfully submitted,

/s/ Rebecca Trujillo

Rebecca Trujillo
Regulatory Consultant

Enclosure

NW Natural Renewable Gas Program
2025 Senate Bill 98 Compliance Report

Pursuant to Oregon Administrative Rule ("OAR") 860-150-0600, Northwest Natural Gas Company ("NW Natural" or the "Company") submits its annual compliance report for the Company's Renewable Natural Gas ("RNG") program. For each reporting requirement in OAR 860-150-0600, NW Natural provides a response with the pertinent information. In accordance with ORS 757.392(3) and ORS 757.396, NW Natural is a "large natural gas utility" for purposes of RNG program compliance.

OAR 860-150-0600(1): A large natural gas utility or a small natural gas utility that participates in the RNG program described in these rules must file an annual compliance report for each year that the utility participates in the program by making RNG purchases or qualified investments. Each compliance report will cover a calendar year, beginning January 1 through and including December 31. The first report is due on June 30 of the year following the first compliance year, and then annually on June 30 thereafter for as long as the utility continues to participate in the program.

NW Natural's compliance report covers the period from January 1, 2025 through December 31, 2025.

OAR 860-150-0600(2)(a): The total volume of RNG acquired during the compliance year by type or source, including the volume as a percentage of the gas utility's sales load delivered to retail

The total volume of RNG received in M-RETS in the compliance year was 2,289,154 Dth from the following sources:

- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from BP in the form of RTCs from dairy manure, landfill gas, anaerobically digested high strength food and green waste, waste water, Biomethane produced from the high-solids (greater than 15 percent total solids) anaerobic digestion of food and green wastes.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from Anew in the form of RTCs from landfill gas, mesophillic anaerobic digestion of wastewater sludge, anaerobically digested high strength food and green waste, and anaerobic digestion of 100% green waste.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from Trident in the form of RTCs from biogas – landfill methane.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from Terreva in the form of RTCs from landfill gas.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth in the form of RTCs from the Dakota City digester gas-wastewater treatment gases.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth in the form of RTCs from the Lexington digester gas-wastewater treatment gases.

The total volume of 2,289,154 Dth represents 3.35% of the Oregon sales load delivered to retail customers.

OAR 860-150-0600(2)(b): A detailed description of the natural gas utility's expenditures that year on RNG purchases and on qualified investments.

BP: NW Natural purchased **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs from BP for **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. In addition, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** was expended in 2025 for the retirement of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs. The sources were:

[BEGIN CONFIDENTIAL]

[redacted]

[END CONFIDENTIAL]

Anew: NW Natural purchased **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs from Anew for **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL].** In addition, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** was expended in 2025 for the retirement of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs. The sources were:

[BEGIN CONFIDENTIAL]

[redacted]

[END CONFIDENTIAL]

Trident: NW Natural purchased **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs from Trident for **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. In addition, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** was expended in 2025 for the retirement of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs, which were from the following resources:

[BEGIN CONFIDENTIAL]

[redacted]

[END CONFIDENTIAL]

Terreva: NW Natural purchased **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs from Terreva for **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. In addition, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** was expended in 2025 for the retirement of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs. The sources were:

[BEGIN CONFIDENTIAL]

[redacted]

[END CONFIDENTIAL]

Dakota City: NW Natural purchased **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs from Dakota City for **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. In addition, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** was expended in 2025 for the retirement of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs. NW Natural has invested a total of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in this qualified investment as detailed below:

- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2025.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2024.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2023.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2022.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2021.

Lexington: NW Natural purchased **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs from Lexington for **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. In addition, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** was expended in 2025 for the retirement of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** RTCs. NW Natural has invested a total of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in this qualified investment as detailed below:

- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2025.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2024.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2023.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2022.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2021.
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** invested in 2020.

OAR 860-150-0600(2)(c): A summary of all transactions that year involving RTCs purchases, acquired, sold, transferred, or retired to comply with these rules.

Purchases: A total of 2,289,154 Dth were purchased and received in M-RETS as outlined in section (2)(a).

Acquired: Not applicable.

Sold: Not applicable.

Transferred: Not applicable.

Retired: A total of 2,289,154 Dth were retired from the following sources:

- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from BP
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from Anew
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from Trident
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from Terreva
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from the Dakota City qualified investment
- **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth from the Lexington qualified investment

OAR 860-150-0600(2)(d): A list of all RTCs that the utility owned and that expired during the compliance year before the utility was able to retire them. The list must be accompanied by information about the value and source of these expired RTCs as well as an explanation for why the utility was not able to retire them prior to expiration.

NW Natural had no RTCs that expired during the compliance year before it was able to retire them.

OAR 860-150-0600(2)(e): The number of unused, unexpired RTCs in the natural gas utility's possession at the end of the compliance year, and the utility's plan to fully utilize these certificates.

NW Natural did not have any unused, unexpired RTCs in the natural gas utility's possession at the end of the compliance year (December 31, 2025).

OAR 860-150-0600(2)(f): The range of carbon intensity values and the average intensity value associated with the RTCs retired that year.

- The range of carbon intensity values for the RTCs retired in the compliance year was -50 gCO_2e/MJ to 91.16 gCO_2e/MJ
- The average intensity value for the RTCs retired in the compliance year was 33.76 gCO_2e/MJ

OAR 860-150-0600(2)(g): Detailed information about qualified investments made during the compliance year, including but not limited to:
(A) The name of the facility where the qualified investment was made;
(B) The location of the facility where the qualified investment was made, including the city/town, county, and state;
(C) The type of facility. For example, the facility type includes but is not limited to a livestock feeding operation, a wastewater treatment plant, a food waste processing facility, a renewable-electricity-to-hydrogen, facility, and so forth;
(D) The total quantity of RNG produced by or procured from that facility during the compliance year;
(E) The expected future annual quantity of RNG to be produced by or procured from that facility;
(F) The average RNG output of the facility expressed in standard cubic feet per minute;
(G) The disposition of RNG produced by the facility but delivered to non-retail utility customers or to non-Oregon customers;
(H) The number and value of RTCs acquired along with the RNG produced by the facility;
(I) An estimate of the carbon intensity for RNG produced at the facility and using an appropriate pathway, pursuant to OAR 860-150-0050.

PROJECT # 1

A. The name of the facility: Lexington Renewable Energy LLC

B. The location of the facility: Lexington, Dawson County, Nebraska

C. The type of facility: Beef processing facility

D. The total quantity of RNG produced by or procured during the compliance year: This facility came online in January 2022 and produced **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth in 2025. NW Natural procured **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth in the compliance year (2025). Note that there is a lag between when the RNG is produced versus when ownership of the RTCs is transferred to NW Natural in M-RETS.

E. The expected future annual quantity of RNG to be produced by or procured from that facility: Expected production in 2026 of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** MMBtu/Year.

F. The average RNG output of the facility: This facility came online in January 2022 and had an average output of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth a month in the compliance year 2025.

G. The disposition of RNG produced by the facility but delivered to non-retail customers or to non-Oregon customers: NW Natural acquired 100 percent of the RTCs associated with the RNG volume as noted in item D. The underlying gas is injected into the Black Hills Energy pipeline system and marketed by Symmetry Energy Solutions LLC.

H. The number and value of RTCs acquired along with the RNG produced by the facility: NW Natural acquired 100 percent of the RTCs associated with the RNG volume noted in item D. NW Natural purchased RTCs from Lexington Renewable Energy LLC for a total of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. Taking into account the sharing amount agreement with NW Natural, the figure is reduced to **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. The volume produced was **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**Dth.

I. An estimate of the carbon intensity for RNG produced at the facility and using an appropriate pathway, pursuant to OAR 860-150-0050: 23.11 g CO_2e/MJ.

PROJECT # 2

A. The name of the facility: Dakota City Renewable Energy LLC

B. The location of the facility: Dakota City, Dakota County, Nebraska

C. The type of facility: Beef processing facility

D. The total quantity of RNG produced by or procured during the compliance year: This facility came online in April 2023 and produced **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth in 2025. NW Natural procured **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth in the compliance year (2025). Note that there is a lag between when the RNG is produced versus when ownership of the RTCs is transferred to NW Natural in M-RETS.

E. The expected future annual quantity of RNG to be produced by or procured from that facility: Expected production in 2026 of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** MMBtu/Year.

F. The average RNG output of the facility: This facility came online in April 2023 and had an average output of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth a month in the compliance year (2025).

G. The disposition of RNG produced by the facility but delivered to non-retail customers or to non-Oregon customers: NW Natural acquired 100 percent of the RTCs associated with the RNG volume as noted in item D. The underlying gas is injected into the MidAmerican pipeline system and marketed by Symmetry Energy Solutions LLC.

H. The number and value of RTCs acquired along with the RNG produced by the facility: NW Natural acquired 100 percent of the RTCs associated with the RNG volume noted in item D. NW Natural purchased RTCs from Dakota City Renewable Energy LLC for a total of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**. Taking into account the sharing amount agreement with NW Natural, the figure is reduced to **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**.The volume produced was **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Dth.

I. An estimate of the carbon intensity for RNG produced at the facility and using an appropriate pathway, pursuant to OAR 860-150-0050: 21.99 g CO2e/MJ.

OAR 860-150-0600(3): A large natural gas utility's annual compliance report must also include a detailed explanation of why the utility achieved, or did not achieve, that year's RNG target volume as specified in ORS 757.396 to include identifying challenges or barriers to RNG market growth.

Since the inception of the SB98 program, NW Natural has pursued opportunities related to the purchase of RNG as well as the development of RNG facilities that will facilitate an increase in the percentage of RNG in its system that would enable the Company to meet or exceed the voluntary targets set forth in the program.

Within the 2022 IRP, Action Item 5, NW Natural outlined its plan to achieve SB 98 targets on a normalized weather basis. The Public Utility Commission of Oregon did not acknowledge Action Item 5 per Order No. 23-281. In response, NW Natural scaled back its RNG procurement activities but still moved forward to secure RNG.

In 2025, the Company's purchased RNG was over 3% of its sales volume in Oregon and it secured contracts to enable 4% RNG in 2026. Within the 2025 IRP, Action Item B-12, NW Natural outlined its plan to achieve 4% RNG for 2026 and 5% RNG in years 2027 through 2030, which was acknowledged by the OPUC.

OAR 860-150-0600(4): A large natural gas utility must explain how annual RNG purchases and qualified investments made during the compliance year aligned with the actions described in the utility's most recently acknowledged integrated resource plan.

See OAR 860-150-0600(3) above.

OAR 860-150-0600(5): A large natural gas utility's annual compliance report must include the total annual incremental costs incurred during the compliance year, calculated as described in OAR 860-150-0200, and expressed as a percentage of the utility's total revenue requirement from its most recent normalized results of operations report.

Percentage of the total revenue requirement: 1.64%

OAR 860-150-0600(6): A small natural gas utility's annual compliance report must include the total costs incurred during the compliance year for RNG purchases and qualified investments, expressed a percentage of the utility's total revenue requirement approved by the Commission in its most recent general rate revision.

Not applicable. NW Natural is defined as a "large gas utility" per ORS 757.392(3).

OAR 860-150-0600(7): A small natural gas utility's annual compliance report must include the total volume of RNG acquired during the compliance year, as well as this volume expressed as a percentage of the total volume of gas delivered to customers that year.

Not applicable. NW Natural is defined as a "large gas utility" per ORS 757.392(3).