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September 17, 2025 NWN OPUC Advice No. 25-22

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: Schedule 330 – Residential Bill Discount Program

Northwest 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 October 29, 2025.

Second Revision of Sheet 330-1	Schedule 330	Residential Bill Discount Program – Optional for Qualifying Customers

Purpose

The purpose of this filing is to make minor administrative changes to Schedule 330 Residential Bill Discount Program – Optional for Qualifying Customers (Bill Discount Program) in order to: 1) extend the re-enrollment period in the Bill Discount Program for fixed income customers from two years to four years; and 2) to clarify how eligible customers are auto-enrolled in the Bill Discount Program.

Background

NW Natural's Bill Discount Program was launched in November 2022 and has experienced robust customer participation, helping to reduce the energy burden of income-qualified customers. Through May 2025, approximately 78 percent of NW Natural's estimated income-qualified customers have enrolled in the Bill Discount Program. Since the start of the program, discounts of approximately $24.2 million have been applied to participating customers' accounts.

Proposed Change

NW Natural proposes that fixed income customers (such as, but not limited to, seniors and disabled customers) have their program eligibility extended from two years to four. This will add to the convenience of participating in the Residential Bill Discount Program for many of NW Natural's customers. The capability for this feature was made possible by updated programming in the Company's customer information system (CIS) and was completed in the fourth quarter of 2024. The proposed tariff language is identical to the Company's Washington bill discount program tariff, which was developed with input from NW Natural's Washington low-income advisory group. NW Natural has shared this update with interested parties at its bill discount and arrearage management workshops held throughout 2025 and has received a positive response for this change.

The Company also proposes revisions to the Bill Discount Program to clarify the auto-enrollment experience for eligible customers. At the start of the Bill Discount Program in 2022, NW Natural

was able to use the capabilities of the CIS to auto-enroll those customers that received energy assistance within the prior 24 months of the program into the Bill Discount Program with a Tier 3 discount. Customers were informed of their auto-enrollment in the program and to contact the Company to enroll in higher discount tiers by providing household size and income.

Since then, NW Natural has worked with its local community action agencies and Oregon Housing and Community Services (OHCS) to systematically obtain the household size and income of customers receiving energy assistance through the agencies, enabling the Company to auto-enroll customers in the Bill Discount Program at the appropriate income tier without further action from the customer. While this arrangement with the agencies and OHCS has worked well and to the benefit of customers, there are still instances where NW Natural will be informed of customers receiving energy assistance, but the household size and income are not known or have not been provided. In these situations, auto-enrollment for these customers will occur with a Tier 3 discount. These customers will still be informed of their auto-enrollment and the ability to enroll in higher discount tiers by providing household size and income. The Company notes that it is actively working with the agencies and OHCS to improve consistency in providing household size and income to enable auto-enrollment at the appropriate income tier. NW Natural has proposed updated language to the tariff to better describe this occurrence. In addition, this proposed change is consistent with the Third Partial Stipulation filed in NW Natural's rate case docket UG 520, which is pending Commission decision.[1]

Conclusion

NW Natural respectfully requests the Commission approve the enclosed tariff proposals effective October 29, 2025. In accordance with ORS 757.205, copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon and on its website at www.nwnatural.com.

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

eFiling
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Respectfully submitted,

/s/ Natasha Siores

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[1] See *In the Matter of Northwest Natural Gas Company dba NW Natural Request for a General Rate Revision,* Docket No. UG 520, Third Partial Multi-Party Stipulation filed Aug. 5, 2025 at page 5.

SCHEDULE 330
RESIDENTIAL BILL DISCOUNT PROGRAM – OPTIONAL FOR QUALIFYING CUSTOMERS

PURPOSE:
The purpose of this schedule is to implement an optional bill discount program for income-qualifying residential customers.

APPLICABLE:
To all income-qualified Residential Customers taking service under Rate Schedule 2 of this Tariff. Income-qualified is defined as Customers with gross household income at or below 60% of Oregon State Median Income (SMI), adjusted for household size. For customers in single-person households, eligibility is extended to those with gross household incomes the greater of 60% SMI or full-time wages at Oregon minimum wage rates for Portland Metro area.

BILL DISCOUNT:
Participating income-qualified Customers will receive the following credit on their monthly bill:

	Income Qualifying	Bill Discount Percentage
Tier 0	0-15% SMI	85%
Tier 1	16-30% SMI	50%
Tier 2	31%-45% SMI	30%
Tier 3*	46%-60% SMI	15%

* For customers in single-person households, Tier 3 eligibility is extended to those with gross household income that is the greater of 60% SMI or full-time wages at Oregon minimum wage rates for Portland Metro area.

SPECIAL CONDITIONS:
1. An Applicant for this bill assistance program must be the account holder and is required to provide an application that includes a self-declaration of household size and income. Household size reflects all permanent residents in the home, including adults and children. Qualifying income refers to total gross annual income, both taxable and nontaxable, from all sources for all persons in the applicant's household.
2. Renewal of a Customer's enrollment is required every two years. It is the customer's responsibility to notify the Company if there is a change in income qualification status. The Company may allow senior, disabled, and other fixed income eligibility for a four-year period. (N) (N)
3. NW Natural may also auto-enroll eligible customers that have received energy assistance or have participated in any of the Company's low-income programs. Customers will be auto-enrolled in the appropriate tier if household size and income are known; if household size and income are not known, customers will be auto-enrolled with a Tier 3 bill discount. Auto-enrolled customers may provide additional information to qualify for higher tier discounts and must re-enroll every two years. (T)(N) (N) (N)
4. Participants that were not auto-enrolled may be subject to post-enrollment verification audit sampling, which may include a showing of proof of household size and income. Bill discounts may be suspended for Customers found to be ineligible or non-responsive during post-enrollment audits. Customers may re-apply for this program upon providing verification of eligibility.

(continue to Sheet 330-2)