

May 20, 2022

NWN WUTC Advice No. 22-03

VIA ELECTRONIC FILING

Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: Schedule K – COVID-19 Assistance Program (CAP)

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), herewith files the following revisions to its Tariff WN U-6, stated to become effective July 1, 2022.

First Revision of Sheet K.1	Schedule K	COVID-19 Assistance Program (CAP)
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Purpose

The purpose of this tariff revision is to add language to the existing Schedule K COVID-19 Assistance Program (CAP) to enable NW Natural to expand its current auto-enrollment of income-qualifying customers.

Background

On March 22, 2021, NW Natural made a tariff filing to introduce the CAP, reflecting the term sheet agreement in U-200281, to establish a temporary COVID-19 assistance program to income-eligible customers. On April 6, 2021, the Company filed revised tariff sheets to reflect changes and input from Commission Staff regarding the program. The tariff proposal was presented at the Commission's April 22, 2021 open meeting and was allowed to become effective April 23, 2021, by operation of law.

Currently the CAP allows for auto-enrollment of past-due customers who have received energy assistance since January 1, 2019. NW Natural proposes to expand auto-enrollment to include customers who earn up to 200% of Federal Poverty Level (FPL) income.

As required by Order 03 in docket U-200281, NW Natural provides monthly reports of CAP activity in docket U-200281.

Proposed Changes

NW Natural proposes tariff language that will allow for additional auto-enrollment of past-due customers. Currently past-due customers who have received energy assistance instance since January 1, 2019 are eligible for auto-enrollment. By adding language stating that the Company may identify additional auto-enrollments for past-due customers earning up to 200% FPL based on availability of customer data, customer need and availability of funds, we hope to reach additional customers needing assistance that may not have availed themselves of energy assistance. Using data from a third-party, NW Natural proposes to identify past-due customers who earn up to 200% FPL for auto-enrollment for CAP grants. NW Natural has acquired Total Source Plus data from a

third-party, Epsilon, which derives the data from multiple sources including census data. The Total Source Plus data set includes household size and income data. Analyzing this data and cross-referencing it with our customer data, we have identified approximately 400 customers in arrears who earn up to 200% FPL that qualify for grants totaling about \$100,000. NW Natural's proposal to add an auto-enrollment using this data will enable these grants to be applied.

NW Natural will also review each grant application individually to confirm the accuracy of the account holder and premise referenced against the income data before the grants are applied to the accounts. In addition, these customers will receive a letter informing them of the CAP funds being applied to their account, providing references for available energy assistance and asking customers to contact NW Natural with any questions.

The CAP was established with funding up to one percent of the Company's revenues, or \$652,000. Through May 9, 2022, NW Natural has provided or committed \$95,379 in CAP grants, resulting in \$556,621 or 85% of remaining available CAP funds.

CAP Grant Activity as of May 9, 2022

Program to Date	Automatic Grants	New Applications	Total
CAP Grants	138	137	275
Average CAP Grant	\$395.69	\$277.64	\$336.88
CAP Funds Expended through April 2022	\$54,604.66	\$38,036.25	\$92,640.91
CAP Funds Committed as of May 9, 2022			\$2,738.28
Subtotal CAP Funds Expended and Committed			\$95,379.19
CAP Funds Authorized			\$652,000.00
CAP Funds Remaining			\$556,620.81
Percent Remaining			85.4%

NW Natural proposes the expansion of CAP auto-enrollment to extend the reach of assistance to customers in need. The idea for this expansion was raised in a GREAT Advisory Group meeting in 2021 and the Company was recently able to acquire the necessary data and perform the needed analysis to bring about this proposal. We shared the enclosed tariff program proposal with our GREAT Advisory Group before this filing and met with Commission Staff, Public Counsel and The Energy Project, who expressed their support of NW Natural making this filing.

NW Natural will continue the current practice of periodically auto-enrolling customers for CAP grants for those past-due customers who have received energy assistance since January 1, 2019, consistent with the existing tariff language.

Conclusion

NW Natural respectfully requests that the Commission allow this tariff change to become effective on July 1, 2022.

In accordance with WAC 480-90-193 and WAC 480-90-195(3), copies of this letter and the attached filing are available in the Company's main office in Portland, Oregon, and on its website at www.nwnatural.com.

As requested by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

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

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NW Natural Rates & Regulatory Affairs
250 SW Taylor Street
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Respectfully submitted,

/s/ Natasha Siores

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Attachment:
NEW-NWN-WUTC-Advice-22-03-Trf-Sheet-K-1-05-20-2022

NORTHWEST NATURAL GAS COMPANY

WN U-6

First Revision of Sheet K.1

Cancels Original Sheet K.1

SCHEDULE K COVID-19 ASSISTANCE PROGRAM (CAP)

PURPOSE:

The purpose of this schedule is to implement the residential COVID-19 Assistance Program (CAP) consistent with Commission Order 02 in docket U-200281. The Order authorizes a Term Sheet that directs Utilities to establish a temporary COVID-19 assistance program to provide eligible residential customers, to include customers earning up to 200 percent (200%) of the Federal Poverty Level (FPL), with an annual maximum award amount of \$2,500 per household.

The CAP will be funded at an initial total amount of \$652,000, not to be increased without prior Commission approval. This amount represents one percent (1%) of the Company's 2019 Washington retail revenues.

ELIGIBILITY:

Residential customers taking service under Rate Schedule 2 of this Tariff and earning up to 200 percent (200%) of the FPL.

APPLICATION:

1. NW Natural will identify past-due customers who have received energy assistance since January 1, 2019 and will proactively apply CAP funds to those accounts to bring them current via auto-enrollment in the CAP. Proactive auto-enrollments may occur periodically based on customer need and availability of funds. Additional auto-enrollments for past-due customers earning up to 200% FPL may also occur periodically based on availability of customer data, customer need and availability of funds.
 - a. CAP grants will not exceed the customer's full account balance or the maximum annual award of \$2,500 per household. Any credit balance as a result of a CAP grant will not be refunded to the customer if the account is closed. Credit balances will be returned to the CAP for distribution to other customers. For purposes of this tariff, the first annual period begins on its effective date.
 - b. NW Natural will send each customer a letter informing them of the CAP funds being applied to their account, providing references for other available energy assistance and asking customers to contact the Company with any questions.
2. Customers not otherwise receiving a CAP grant in 1(a) will apply for energy assistance at their local agency to determine income eligibility and can receive CAP grants directly from NW Natural up to the maximum annual award of \$2,500 per household.
3. CAP grants can be applied to a past due or full account balance on an active account.

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(N)

SPECIAL CONDITIONS:

1. The Company will defer and seek recovery of all associated program costs in accordance with Commission Order 02 in docket U-200281 and Order 01 in docket UG-200264.
2. In addition to the reporting requirements outlined in Commission Order 02 in docket U-200281, 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.

(continue to Sheet K.2)

Issued May 20, 2022
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Effective with service on
and after July 1, 2022