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June 20, 2012

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
550 Capitol Street, NE, Suite 215
Post Office Box 2148
Salem, Oregon 97308-2148

Attn: Filing Center

RE: OPUC Docket UM 1101 - Application for Reauthorization for Deferred Accounting of Intervenor Funding Grants

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), hereby electronically files the above-referenced Application for Reauthorization for Deferred Accounting of Intervenor Funding Grants.

A notice concerning this application will be sent to all parties of record in the Company's current general rate case, UG 221. A copy of the notice is part of the enclosed application.

If you have any questions, please call Jennifer Gross at (503) 226-4211, extension 3590.

Sincerely,

/s/ Mark R. Thompson

Mark R. Thompson
Manager, Regulatory Affairs

attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. UM 1101

In the Matter of the Application of
NORTHWEST NATURAL GAS COMPANY,
dba NW NATURAL, for reauthorization to defer
expenses for Intervenor Funding Grants.

**APPLICATION OF
NW NATURAL**

1 In accordance with ORS 757.259 and OAR 860-027-0300, NW Natural (or the
2 “Company”) files this application with the Public Utility Commission of Oregon (the
3 “Commission”) requesting an order re-authorizing the Company to record and defer the cost of
4 intervenor funding grants provided to qualifying organizations pursuant to the provisions of ORS
5 757.259(3), as amended by Oregon Laws 2003, chapter 234 (“Intervenor Funding Grants”) for
6 future amortization in rates. This request is for the period July 1, 2012 through June 30, 2013.

7 In support of this Application, NW Natural states:

8 **1. NW Natural**

9 NW Natural is a public utility in the state of Oregon and is subject to the jurisdiction of
10 the Commission with regard to rates, service, and accounting practices. NW Natural provides
11 retail natural gas service in the states of Oregon and Washington.

12 **2. Statutory Authority**

13 This Application is filed pursuant to ORS 757.259, which empowers the Commission to
14 authorize the deferral of expenses or revenues of a public utility for later incorporation in rates.

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17 //

18 //

1 **3. Communications**

2 NW Natural hereby waives paper service in this docket. Please direct communications
3 regarding this Application to:

4 Jennifer Gross
5 Rates & Regulatory Affairs
6 NW Natural
7 220 NW Second Avenue
8 Portland, OR 97209-3991
9 Telephone: (503) 226-4211, extension 3590
10 Facsimile: (503) 721-2516
11 E-mail: jennifer.gross@nwnatural.com
12

13 and

14
15 Rates & Regulatory Affairs
16 NW Natural
17 220 NW Second Avenue
18 Portland, OR 97209-3991
19 E-mail: eFiling@nwnatural.com
20

21
22 **4. Basis for Application**

23 Statutory Authority

24 On June 6, 2003, the Governor signed Oregon Laws 2003, chapter 234 (formerly known
25 as Senate Bill 205, the "Intervenor Funding Act") into law (ORS 757.259). Section 2 of the
26 Intervenor Funding Act authorizes the Commission to approve written agreements for intervenor
27 funding grants between electric and natural gas utilities and qualifying organizations
28 representing broad customer interests. Such grants would be used by these qualifying
29 organizations when participating in certain types of regulatory proceedings before the
30 Commission. Section 2 of the Intervenor Funding Act also authorizes the Commission to
31 establish rules with respect to funding agreements for determining which organizations are
32 eligible for financial assistance, the amount of assistance that may be provided, the manner in
33 which assistance will be distributed, and other necessary administrative matters.

34 //

1 Moreover, Section 2 of the Intervenor Funding Act provides:

2 “The commission shall allow a public utility that provides financial
3 assistance under this section to recover the amounts so provided
4 in rates. The commission shall allow a public utility to defer
5 inclusion of those amounts in rates as provided in ORS 757.259 if
6 the public utility so elects.”

7 ORS 757.259(3), as amended by section 3 of the Intervenor Funding Act, provides:

8
9 “Upon request of the public utility, the commission by order shall
10 allow deferral of amounts provided as financial assistance under
11 an agreement entered into under section 2 of this 2003 Act for
12 later incorporation in rates.”

13
14 Additionally, the Company notes that deferred amounts under ORS 757.259(3) are not
15 subject to the percentage of gross revenues limitation on amortization or other provisions of
16 subsections (5), (6), (7), and (8) of the amended section.

17 Commission Approval of the Intervenor Funding Agreement

18 On December 19, 2007, the Commission issued Order No. 07-564, which approved
19 amendments to the original Intervenor Funding Agreement previously approved in Order No.
20 03-388. The parties to this amended Intervenor Funding Agreement are NW Natural, Portland
21 General Electric Company, PacifiCorp, Cascade Natural Gas Corporation, Avista Corporation,
22 Industrial Customers of Northwest Utilities (ICNU), Citizens’ Utility Board of Oregon (CUB), and
23 Northwest Industrial Gas Users (NWIGU). The Intervenor Funding Agreement sets forth the
24 amount of funding to be contributed by each utility and the procedures for budget submittals by
25 intervenors, Commission approval of budgets, and the payment of grants by utilities. In a
26 subsequent order, Order No. 12-009, the Commission directed the utilities to pay to CUB the
27 amounts made available for the CUB Fund Grants as defined and provided for in the Intervenor
28 Funding Agreement (\$57,500 for NW Natural). Express Commission approval for payment was
29 necessitated by Section 7.1 of the Intervenor Funding Agreement, which provides that “upon
30 request by CUB, the Commission will direct the Participating Public Utilities to pay the amounts
31 made available for CUB Fund Grants. . . ”

1 **5. OAR 860-027-0300(3)(a) - Description of Utility Expense for which deferred**
2 **accounting is requested.**

3 In accordance with the statutory authority provided by ORS 757.259(3), as amended,
4 and the Commission's approval of the Intervenor Funding Agreement, NW Natural proposes to
5 record and defer the amount of its payment to CUB as directed by Commission Order No. 12-
6 009. The request is pursuant to the terms of the First Amended and Restated Intervenor
7 Funding Agreement (Agreement), approved by the Commission in Order No. 07-564.
8 Additionally, the Company proposes to record and defer, on an ongoing basis, any and all
9 Intervenor Funding Grants as defined and provided for in the Intervenor Funding Agreement, for
10 later incorporation in rates. The Company will record and defer these ongoing costs upon
11 payment of the Intervenor Funding Grants following the Commission's approval of the
12 Intervenor Funding Grant and issuance of an Order directing the Company to make payment,
13 pursuant to the Intervenor Funding Agreement.

14 **6. OAR 860-027-0300(3)(b) The reason deferred accounting is being requested.**

15 This request is made in accordance ORS 757.259(3) that allows for the deferral of
16 Intervenor funds, and Commission Order No. 12-009 in Docket No. UM 1357 which directs NW
17 Natural to pay to CUB the amounts made available for the CUB Fund Grants as defined and
18 provided for in the Intervenor Funding Agreement (\$57,500 for NW Natural).

19 **7. OAR 860-027-0300(3)(c) The account proposed for recording the amounts in the**
20 **absence of deferred accounting.**

21 NW Natural proposes to record payment of Intervenor Funding Grants in a subaccount
22 of Account 186. In the absence of the Commission's approval of this Application, the Company
23 would not incur the cost of Intervenor Funding Grants. Were such costs incurred, however, they
24 would be recorded in an appropriate subaccount of FERC Account 401.

25 //

26 //

1 **8. OAR 860-027-0300(3)(d) Amounts Subject to Deferral**

2 NW Natural anticipates that the maximum amounts to be deferred during the 12-month
3 period subsequent to the Application are:

	<u>Fund</u>
CUB Fund	\$ 57,500
Preauthorized Matching Fund	\$ 57,500
Issue Fund	<u>\$ 57,500</u>
Total	<u>\$172,500</u>

4
5 For the 12-month period covered by this Application, NW Natural anticipates that the
6 amount subject to this deferral will not exceed \$172,500. However, the Intervenor Funding
7 Agreement permits under certain circumstances for an advance of funds that would otherwise
8 be available in future years, or for the rollover of unused funds from a previous year for
9 Intervenor Funding Grants from the CUB Fund and the Preauthorized Matching Fund. If an
10 advance is made under the applicable provision of the Intervenor Funding Agreement, or grants
11 are made based on available rollover funds, the maximum annual amounts of Intervenor
12 Funding Grants from the CUB Fund or the Preauthorized Grant Fund could exceed the level
13 specified in this paragraph in which case the amount deferred under this Application could
14 exceed \$172,500. Additionally, NW Natural understands that the Intervenor Funding
15 Agreement may be re-negotiated before the end of this year, and this re-negotiation could
16 change the amounts deferred under this Application.

17 **9. OAR 860-027-0300(4)(a) A description and explanation of the entries in the**
18 **deferred account to date of the application for reauthorization.**

19 Attached to this application are work papers detailing the amounts deferred to-date
20 under UM 1101.

21 //

1 **10. Requirements per Commission Order No. 09-263**

2 Below is the information required per Commission Order No. 09-263, issued in Docket
3 UM-1286, Staff's Investigation into Purchased Gas Adjustment Mechanisms:

4 **a. A completed Summary Sheet, the location in the PGA filing, and an account**
5 **map that highlights the transfer of dollars from one account to another**

6 Exhibit A provides the Summary Sheets which show the amounts deferred. Exhibit A
7 will be included in the 2012 PGA filing work papers and in the electronic file entitled
8 "Proposed Temps Oregon 2012-13 PGA filing.xls."

9 **b. The effective date of the deferral**

10 This application is for the 12-month period beginning July 1, 2012 and ending June
11 30, 2013.

12 **c. Prior year Order Number approving the deferral**

13 Approval to defer costs associated with intervenor funding was last granted under
14 Commission Order No. 11-240.

15 **d. The amount deferred last year.**

	Issue Fund Acct 186284	CUB Fund Acct 186276	Matching Fund Acct 186278
Deferred amounts July 1, 2011 through March 31, 2012	\$58,351	\$57,500	\$0

16 **e. The amount amortized last year**

	CUB Fund Acct 186286	Matching Fund Acct 186288
Amortized amounts November 1, 2010 through March 31, 2011 with interest	\$77,798	\$8,781

17 **f. The interest rate that will apply to the accounts**

18 While the Company does not currently accrue interest on balances deferred for
19 intervenor funding, the Company is authorized to include carrying costs in
20 accordance with Section 7.9 of the First Amended and Restated Funding Agreement
21 included as Attachment A to Commission Order No. 07-564.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of Intervenor Funding - ISSUE FUND
 Account Number: 186284
 Docket UM 1101
 Last order for reauthorization was Order No. 11-240

1	Debit	(Credit)									
2											
3											
4	Month/Year	Note	Deferral-CUB	Deferral-NWIGU	Transfers-CUB	Transfers-NWIGU	Interest (1)	Activity	Balance-CUB	Balance-NWIGU	Balance Grand Total
5	(a)	(b)	(c1)	(c2)	(d1)	(d2)	(e)	(f)	(g1)	(g2)	(gtotal)
6					to 186286	to 186288					
7	Beginning Balance				amort account	amort account					
48	Jan-10							0	0	0	0
49	Feb-10							0	0	0	0
50	Mar-10							0	0	0	0
51	Apr-10							0	0	0	0
52	May-10							0	0	0	0
53	Jun-10							0	0	0	0
54	Jul-10							0	0	0	0
55	Aug-10							0	0	0	0
56	Sep-10							0	0	0	0
57	Oct-10							0	0	0	0
58	Nov-10							0	0	0	0
59	Dec-10							0	0	0	0
60	Jan-11							0	0	0	0
61	Feb-11							0	0	0	0
62	Mar-11							0	0	0	0
63	Apr-11							0	0	0	0
64	May-11	2		15,800				15,800	0	15,800	15,800
65	Jun-11							0	0	15,800	15,800
66	Jul-11							0	0	15,800	15,800
67	Aug-11	2	58,351					58,351	58,351	15,800	74,151
68	Sep-11							0	58,351	15,800	74,151
69	Oct-11							0	58,351	15,800	74,151
70	Nov-11	3			(58,351)	(15,800)		(74,151)	0	0	0
71	Dec-11							0	0	0	0
72	Jan-12							0	0	0	0
73	Feb-12							0	0	0	0
74	Mar-12							0	0	0	0

76 History truncated for ease of viewing

78 **NOTES**

79 1 - No interest is applied to this activity

81 2 - Payments made in:

82 May 2011 - see order 11-162

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of CUB Intervenor Funding
 Account Number: 186276
 Docket UM 1101
 Last order for reauthorization was Order No. 11-240

1	Debit	(Credit)					
2							
3							
4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
48	Jan-10	2	57,500			57,500	57,500
49	Feb-10		0			0	57,500
50	Mar-10		0			0	57,500
51	Apr-10		0			0	57,500
52	May-10		0			0	57,500
53	Jun-10		0			0	57,500
54	Jul-10		0			0	57,500
55	Aug-10		0			0	57,500
56	Sep-10		0			0	57,500
57	Oct-10		0			0	57,500
58	Nov-10	3	0	(57,500)		(57,500)	0
59	Dec-10		0			0	0
60	Jan-11	2	57,500			57,500	57,500
61	Feb-11		0			0	57,500
62	Mar-11		0			0	57,500
63	Apr-11		0			0	57,500
64	May-11		0			0	57,500
65	Jun-11		0			0	57,500
66	Jul-11		0			0	57,500
67	Aug-11		0			0	57,500
68	Sep-11		0			0	57,500
69	Oct-11		0			0	57,500
70	Nov-11	3	0	(57,500)		(57,500)	0
71	Dec-11		0			0	0
72	Jan-12	2	57,500			57,500	57,500
73	Feb-12		0			0	57,500
74	Mar-12		0			0	57,500

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 76 **History truncated for ease of viewing**

77
 78 **NOTES**

79 **1** - No interest is applied to this activity

80
 81 **2** - Payments made in:

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of CUB Intervenor Funding
 Account Number: 186286
 Dockets UG 206 and UM 1101
 Amortization of 2010 deferral approved in Order 11-446 of UG 206

1	Debit	(Credit)						
2								
3								
4	Month/Year	Note	Amortization	Transfers	Interest	Interest	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
6								
7	Beginning Balance							
52	Jan-10		(13,204)		95	2.05%	(13,109)	48,907
53	Feb-10		(9,267)		76	2.05%	(9,192)	39,715
54	Mar-10		(7,967)		61	2.05%	(7,906)	31,809
55	Apr-10		(7,519)		48	2.05%	(7,471)	24,338
56	May-10		(5,451)		37	2.05%	(5,414)	18,924
57	Jun-10		(3,939)		29	2.05%	(3,910)	15,013
58	Jul-10		(2,305)		24	2.05%	(2,282)	12,732
59	Aug-10		(1,708)		20	2.05%	(1,688)	11,044
60	Sep-10		(1,911)		17	2.05%	(1,894)	9,150
61	Oct-10		(2,596)		13	2.05%	(2,582)	6,567
62	Nov-10	old rates	(3,024)		9	2.05%	(3,015)	3,552
63		new rates (1)	(2,080)	57,500	96	2.24%	55,517	59,069
64	Dec-10		(9,224)		102	2.24%	(9,123)	49,946
65	Jan-11		(10,747)		83	2.24%	(10,664)	39,283
66	Feb-11		(8,449)		65	2.24%	(8,383)	30,899
67	Mar-11		(8,939)		49	2.24%	(8,890)	22,010
68	Apr-11		(6,567)		35	2.24%	(6,532)	15,478
69	May-11		(4,987)		24	2.24%	(4,963)	10,515
70	Jun-11		(3,027)		17	2.24%	(3,010)	7,505
71	Jul-11		(1,647)		12	2.24%	(1,635)	5,870
72	Aug-11		(1,337)		10	2.24%	(1,327)	4,544
73	Sep-11		(1,357)		7	2.24%	(1,350)	3,194
74	Oct-11		(2,063)		4	2.24%	(2,059)	1,135
75	Nov-11	old rates	(2,546)		(0)	2.24%	(2,546)	(1,412)
76		new rates (1)	(5,180)	115,851	190	2.01%	110,860	109,449
77	Dec-11		(18,892)		168	2.01%	(18,725)	90,724
78	Jan-12		(20,941)		134	2.01%	(20,807)	69,917
79	Feb-12		(17,003)		103	2.01%	(16,900)	53,017
80	Mar-12		(16,451)		75	2.01%	(16,376)	36,641

82 History truncated for ease of viewing

83 NOTES

84 1 - Transfer from CUB Deferral account 186276 and Issue Fund Deferral account 186284

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of NWIGU Intervenor Funding
 Account Number: 186278
 Docket UM 1101
 Last order for reauthorization was Order No. 11-240

1	Debit	(Credit)					
2							
3							
4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
48	Jan-10		0			0	993
49	Feb-10		0			0	993
50	Mar-10		0			0	993
51	Apr-10	2	677			677	1,670
52	May-10		0			0	1,670
53	Jun-10		0			0	1,670
54	Jul-10		0			0	1,670
55	Aug-10		0			0	1,670
56	Sep-10		0			0	1,670
57	Oct-10		0			0	1,670
58	Nov-10	3	0	(1,670)		(1,670)	0
59	Dec-10		0			0	0
60	Jan-11		0			0	0
61	Feb-11		0			0	0
62	Mar-11		0			0	0
63	Apr-11	2	3,112			3,112	3,112
64	May-11		0			0	3,112
65	Jun-11		0			0	3,112
66	Jul-11		0			0	3,112
67	Aug-11		0			0	3,112
68	Sep-11		0			0	3,112
69	Oct-11		0			0	3,112
70	Nov-11	3	0	(3,112)		(3,112)	0
71	Dec-11		0			0	0
72	Jan-12		0			0	0
73	Feb-12		0			0	0
74	Mar-12		0			0	0

75
 76 **History truncated for ease of viewing**

77
 78 **NOTES**

79 **1** - No interest is applied to this activity

80
 81 **2** - Payments made in:

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of NWIGU Intervenor Funding
 Account Number: 186288
 Dockets UG 206 and UM 1101
 Amortization of 2010 deferral approved in Order 11-446 of UG 206

1	Debit	(Credit)						
2								
3						Interest		
4	Month/Year	Note	Amortization	Transfers	Interest	rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(e2)	(f)	(g)
6								
7	Beginning Balance							
37	Jan-10		(919)		12	2.23%	(906)	6,257
38	Feb-10		(826)		11	2.23%	(815)	5,442
39	Mar-10		(912)		9	2.23%	(903)	4,539
40	Apr-10		(858)		8	2.23%	(850)	3,689
41	May-10		(839)		6	2.23%	(833)	2,856
42	Jun-10		(793)		5	2.23%	(789)	2,067
43	Jul-10		(782)		3	2.23%	(779)	1,289
44	Aug-10		(781)		2	2.23%	(780)	509
45	Sep-10		(782)		0	2.23%	(852)	(273)
46	Oct-10		(857)		(1)	2.23%	(859)	(1,131)
47	Nov-10 old rates		(34)		(2)	2.23%	(36)	(1,167)
48	new rates (1)		0	1,670	0	0.00%	1,670	503
49	Dec-10		0		0	0.00%	0	503
50	Jan-11		0		0	0.00%	0	503
51	Feb-11		0		0	0.00%	0	503
52	Mar-11		0		0	0.00%	0	503
53	Apr-11		0		0	0.00%	0	503
54	May-11		0		0	0.00%	0	503
55	Jun-11		0		0	0.00%	0	503
56	Jul-11		0		0	0.00%	0	503
57	Aug-11		0		0	0.00%	0	503
58	Sep-11		0		0	0.00%	0	503
59	Oct-11	2	0	(115)	0	0.00%	(115)	388
60	Nov-11	1	(1,285)	18,912	31	2.01%	17,658	18,046
61	Dec-11		(1,992)		29	2.01%	(1,963)	16,082
62	Jan-12		(1,834)		25	2.01%	(1,809)	14,274
63	Feb-12		(1,843)		22	2.01%	(1,821)	12,453
64	Mar-12		(1,954)		19	2.01%	(1,934)	10,519

66 History truncated for ease of viewing

69 **NOTES**

70 **1** - Transfer in is from the October balances of NWIGU Deferral account 186278 and Issue Fund Deferral account 186284. Amount from 2010 will be
 71 held here until NWIGU funds contributed are of size to create a rate increment in the future.

72
 73 **2** - Transfer represents a balance true-up adjustment.



June 20, 2012

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO
DEFER INTERVENOR COSTS**

To All Parties Who Participated in UG 221:

Please be advised that today Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for reauthorization to defer Intervenor Costs, pursuant to the provisions of ORS 757.259(2)(e). Copies of the Company's application are available for inspection at its main office.

This is not a rate case. The purpose of this Notice is to inform parties of record in the Company's most recent general rate case, UG 221, that the Application was filed.

Parties who desire more information or who wish to obtain a copy of the filing, or notice of the time and place of any hearing, if scheduled, should contact the Company or the Public Utility Commission of Oregon as follows:

NW Natural
Attn: Jennifer Gross
220 NW Second Avenue
Portland, Oregon 97209-3991
Telephone: (503) 226-4211 ext 3590

Public Utility Commission of Oregon
Attn: Judy Johnson
550 Capitol St., NE, Ste 215
PO Box 2148
Salem, Oregon 97308-2148
Telephone: (503) 378-6636

Any person may submit to the Commission written comments on this matter no sooner than 25 days from the date of this Application. The granting of this Application will not authorize a change in rates, but will permit the Company to defer amounts in rates to a subsequent proceeding.



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing NOTICE OF APPLICATION FOR DEFERRED ACCOUNTING ORDER FOR INTERVENOR COSTS, upon all parties of record in the UG 221 proceeding, which is the Company's most recent general rate case, by electronic mail.

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