



250 SW Taylor Street
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nwnatural.com

June 24, 2020

VIA ELECTRONIC FILING

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

RE: UM 1101: Application for Reauthorization to Defer Certain Expenses or Revenues for Intervenor Funding Grants

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), hereby electronically files the above-referenced Application for Reauthorization to Defer Certain Expenses or Revenues pursuant to provisions of ORS 757.259 for Intervenor Funding Grants.

A Notice concerning this Application will be sent to all parties who are participating in the Company’s currently ongoing general rate case, UG 388. A Certificate of Service and a copy of the Notice are part of the enclosed Application.

If you have any questions, please call me at (503) 610-7051

Sincerely,

/s/ Kyle Walker, CPA
Kyle Walker, CPA
Rates/Regulatory Manager

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1101

<p>In the Matter of</p> <p>NORTHWEST NATURAL GAS COMPANY, dba, NW NATURAL</p> <p>For Reauthorization to Defer Certain Expenses or Revenues Pursuant to ORS 757.259</p>	<p>Application</p>
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1 In accordance with ORS 757.259 and OAR 860-027-0300, Northwest Natural
2 Gas Company (“NW Natural” or the “Company”) files this application with the Public
3 Utility Commission of Oregon (the “Commission”) requesting an order re-authorizing the
4 Company to record and defer the cost of intervenor funding grants provided to qualifying
5 organizations pursuant to the provisions of ORS 757.259(3) for future amortization in
6 rates. This request is for the period July 1, 2020, through June 30, 2021.

7 In support of this Application, NW Natural states:

8 **A. NW Natural.**

9 NW Natural is a public utility in the State of Oregon and is subject to the
10 jurisdiction of the Commission regarding rates, service, and accounting practices. NW
11 Natural also provides retail natural gas service in the States of Oregon and Washington.

12 **B. Statutory Authority.**

13 ORS 757.072(2) authorizes the Commission to approve written agreements for
14 intervenor funding grants between electric and natural gas utilities and qualifying
15 organizations representing broad customer interests. Such grants are used by these
16 qualifying organizations when participating in regulatory proceedings before the

1 Commission. ORS 757.072(3) authorizes the Commission to establish rules with
2 respect to funding agreements for determining which organizations are eligible for
3 financial assistance, the amount of assistance that may be provided, the manner in
4 which assistance will be distributed, and other necessary administrative matters.

5 Moreover, ORS 757.072(4) provides:

6 “The commission shall allow a public utility that provides
7 financial assistance under this section to recover the
8 amounts so provided in rates. The commission shall allow a
9 public utility to defer inclusion of those amounts in rates as
10 provided in ORS 757.259 if the public utility so elects.”
11

12 ORS 757.259(3), provides:

13 “Upon request of the public utility, the commission by order
14 shall allow deferral of amounts provided as financial
15 assistance under an agreement entered into under ORS
16 757.072 for later incorporation in rates.”
17

18 Additionally, the Company notes that deferred amounts under ORS 757.259(3) are not
19 subject to the percentage of gross revenues limitation on amortization or other
20 provisions of subsections (5), (6), (7), (8), or (10) of ORS 757.259.

21 **C. Background of Request for Reauthorization.**

22 On July, 2, 2003, pursuant to Section 2 of the Intervenor Funding Act, the
23 Commission issued Order No. 03-388, which, among other things, approved the
24 Intervenor Funding Agreement among NW Natural, Portland General Electric,
25 PacifiCorp, Cascade Natural Gas Corporation, Avista Corporation, Industrial Customers
26 of Northwest Utilities (“ICNU”), Citizens’ Utility Board (“CUB”), Northwest Industrial Gas
27 Users (“NWIGU”) (collectively referred to hereafter as “Joint Parties”), dated February 5,
28 2003. The Intervenor Funding Agreement set forth the amount of funding to be
29 contributed by each utility and the procedures for budget submittals by intervenors,

1 Commission approval of budgets, and the payment of grants by utilities. It also
2 established the three funds from which “Intervenor Funding Grants” can be made: CUB
3 Fund, Preauthorized Matching Fund (hereinafter also referred to as the “NWIGU Fund,”
4 because it was for the exclusive use of NWIGU when applicable to NW Natural) and
5 Issue Fund.

6 In its subsequent Order No. 03-405, the Commission directed the utilities to pay
7 CUB the amount made available for the CUB Fund Grants as defined and provided for
8 in the Intervenor Funding Agreement. Express Commission approval for payment was
9 necessitated by Section 7.1 of the Intervenor Funding Agreement, which provides that
10 “upon request by CUB, the Commission will direct the Participating Public Utilities to pay
11 the amounts made available for the CUB Fund.”

12 On December 29, 2007, the Commission issued Order No. 07-564, which
13 approved amendments to the Intervenor Funding Agreement previously approved in
14 Order No. 03-388. In 2012, Joint Parties executed a Second Amended and Restated
15 Intervenor Funding Agreement which the Commission approved in Order No. 12-452.
16 This Second Amended and Restated Intervenor Funding Agreement, effective January
17 1, 2013, through December 31, 2017, increased the CUB Fund, the Preauthorized
18 Matching Fund (NWIGU Fund), and the Issue Fund by 15% above the levels allowed in
19 prior years. The Commission approved the Third Amended and Restated Intervenor
20 Funding Agreement, effective August 1, 2015 through December 31, 2017, in Order No.
21 15-335. The amended Intervenor Funding Agreement increased the Issue Fund
22 amount for NW Natural and for Avista Utilities. NW Natural’s Issue Fund amount was
23 changed from \$66,125 to \$143,750.

1 The Commission approved the Fourth Amended and Restated Intervenor
2 Funding Agreement, effective January 1, 2018 through December 31, 2022, in Order
3 No. 18-017. The amended Intervenor Funding Agreement increased approximately 45
4 percent in total funds available annually in the CUB Fund, and increased approximately
5 10 percent in total funds available annually in the Preauthorized Matching Funds
6 (NWIGU Fund). In addition, for each Preauthorized Matching Fund (NWIGU Fund), the
7 annual amount for each calendar year after 2018 and during the term of the agreement
8 increases by 3 percent each year. The agreement now allows the Alliance of Western
9 Energy Consumers (“AWEC”)¹ to request payment of Preauthorized Matching Fund
10 Grants semi-annually, and lowers the matching amount of internal resources or outside
11 funding from 50 percent to 35 percent.

12 **D. Communications.**

13 Communications regarding this Application should be addressed to:

NW Natural
e-Filing for Regulatory Affairs
250 Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7330
Facsimile: (503) 721-2516
Email: eFiling@nwnatural.com

Zachary D. Kravitz (OSB# 152870)
Rates/Regulatory Director
250 Taylor Street
Portland, Oregon 97204
Phone: (503) 610-7617
Email: Zachary.kravitz@nwnatural.com

Kyle Walker, CPA
Rates/Regulatory Manager
250 Taylor Street
Portland, Oregon 97204
Phone: (503) 610-7051
Email: Kyle.Walker@nwnatural.com

¹ ICNU and NWIGU have merged their organizations and are now AWEC, and the NWIGU Fund now is called the “AWEC Fund.”

1 **E. Description of the Expenses or Revenues for which Deferred Accounting is**
2 **Requested – OAR 860-027-0300(3)(a).**

3 In accordance with the statutory authority provided by ORS 757.259(3), and the
4 Commission’s approval of the Fourth Amended and Restated Intervenor Funding
5 Agreement, NW Natural proposes to record and defer the amount of its payment to
6 CUB as directed by Commission Order No. 18-017. The request is pursuant to the
7 terms of the Fourth Amended and Restated Intervenor Funding Agreement, approved
8 by the Commission in Order No. 18-017.

9 Additionally, the Company proposes to record and defer, on an ongoing basis,
10 any and all Intervenor Funding Grants as defined and provided for in the Fourth
11 Amended and Reinstated Intervenor Funding Agreement, for later incorporation in rates.
12 The Company will record and defer these ongoing costs upon payment of the Intervenor
13 Funding Grants following the Commission’s approval of the Intervenor Funding Grant
14 and issuance of an Order directing the Company to make payment, pursuant to the
15 Fourth Amended and Restated Intervenor Funding Agreement.

16 **F. Reasons for Application for Reauthorization of Deferred Accounting – OAR**
17 **860-027-0300(3)(b).**

18 This request is made in accordance with ORS 757.259(3) that allows for the
19 deferral of Intervenor funds, and Commission Order No. 18-017 in docket UM 1929,
20 which directs NW Natural to pay CUB the amounts made available for the CUB Fund
21 Grants as defined and provided for in the Fourth Amended and Restated Intervenor
22 Funding Agreement (\$101,125 for NW Natural).

1 **G. Accounting – OAR 860-027-0300(3)(c).**

2 NW Natural proposes to record payment of Intervenor Funding Grants in a
3 subaccount of Account 186. In the absence of the Commission’s approval of this
4 Application, the Company would not incur the cost of Intervenor Funding Grants. Were
5 such costs incurred, however, they would be recorded in an appropriate sub-account of
6 FERC Account 401.

7 **H. Estimated Accounts Subject to Deferral – OAR 860-027-0300(3)(d).**

8 Under the current agreement, the estimated amounts for 2020 are displayed in
9 the table below. The estimated amounts of the Preauthorized Matching Fund (AWEC
10 Fund) will increase by three percent in 2020:

<u>Fund</u>	
CUB Fund	\$ 101,125
Preauthorized Matching Fund (AWEC Fund)	\$ 77,168
Issue Fund	<u>\$ 143,750</u>
Total	<u><u>\$ 322,043</u></u>

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

13 Attached as Exhibit A to this application are work papers detailing the amounts
14 deferred to date under UM 1101.

15 **J. Reasons for Continued Deferral – OAR 860-027-0300(4)(b).**

16 The deferral is forecasted to continue as long as the Commission amends the
17 Intervenor Funding Agreement which expires December 31, 2022.

1 **K. Requirement per Commission Order No. 09-263.**

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

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

7 Exhibit A provides the Summary Sheets which show the amounts deferred.
8 Exhibit A will be included in the 2020 PGA filing work papers and in the
9 electronic file entitled "Proposed Temps Oregon 2020-21 PGA filing.xls."

10 **2. The effective date of the deferral.**

11 This application is for the 12-month period beginning July 1, 2020 and ending
12 June 30, 2021.

13 **3. Prior year Order Number approving the deferral.**

14 Approval to defer costs associated with intervenor funding was last granted
15 under Commission Order No. 19-250.

16 **4. The amount deferred last year.**

	Issue Fund	CUB Fund	AWEC Fund
	<u>Acct 186284</u>	<u>Acct 186276</u>	<u>Acct 186278</u>
Deferred amounts July 1, 2019 through May 31, 2020	8,768	\$101,125	\$14,652

17 ///

18 ///

19 ///

20 ///

1 **5. The amount amortized last year.²**

	CUB Fund	AWEC Fund
	<u>Acct 186286</u>	<u>Acct 186288</u>
Amortized amounts November 1, 2019 through May 31, 2020 with interest	\$149,650	\$87,535

2 **6. The interest rate that will apply to the accounts.**

3 While the Company does not currently accrue interest on balances deferred
4 for intervenor funding, the Company is authorized to include carrying costs in
5 accordance with Section 7.9 of the Second Amended and Restated
6 Agreement included as attachment A to Commission Order No. Order No. 12-
7 452.

8 **7. An estimate of the upcoming PGA-period deferral and/or amortization.**

9 The Company estimates that it will defer, and ultimately seek to amortize, up
10 to \$322,043.

11 **L. Notice – OAR 800-027-0300(6).**

12 A notice of this Application has been served on all parties that are participating in
13 the Company's current general rate case, UG 388, and is attached to this Application.

14 NW Natural respectfully requests that in accordance with ORS 757.259(3), as
15 amended, the Commission authorize the Company to record and defer Intervenor
16 Funding Grants incurred by the Company pursuant to the Intervenor Funding
17 Agreement, as described in this Application.

18 ///

² For purposes of amortization, the amount of the Issue Fund deferred related to CUB is amortized in the CUB Fund and the amount of the Issue Fund deferred related to AWEC is amortized in the AWEC Fund.

1 DATED this 24th day of June 2020.

2 Respectfully Submitted,

3 NW NATURAL

4 /s/ Kyle Walker, CPA
5 Kyle Walker, CPA
6 Rates/Regulatory Manager

7 /s/ Zachary D. Kravitz
8 Zachary D. Kravitz (OSB# 152870)
9 Rates/Regulatory Director
10 250 Taylor Street
11 Portland, Oregon 97204
12 Phone: (503) 610-7617
13 Email: zdk@nwnatural.com

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of Intervenor Funding - ISSUE FUND
 Account Number: 186284
 Docket UM 1101
 Last deferral reauthorization was approved in Order No. 19-250

1 Debit (Credit)
 2
 3

4	Month/Year	Note	Deferral-CUB	Deferral-AWEC	Transfers-CUB	Transfers-AWEC	Interest (1)	Activity	Balance-CUB	Balance - AWEC	Balance Grand Total
5	(a)	(b)	(c1)	(c2)	(d1)	(d2)	(e)	(f)	(g1)	(g2)	(gtotal)
6					to 186286	to 186288					
7					amort account	amort account					
158	Jun-19							-	90,619.47	113,900.00	204,519.47
159	Jul-19							-	90,619.47	113,900.00	204,519.47
160	Aug-19							-	90,619.47	113,900.00	204,519.47
161	Sep-19							-	90,619.47	113,900.00	204,519.47
162	Oct-19	2		8,768.70				8,768.70	90,619.47	122,668.70	213,288.17
163	Nov-19	3			(90,619.47)	(113,900.00)		(204,519.47)	-	8,768.70	8,768.70
164	Dec-19							-	-	8,768.70	8,768.70
165	Jan-20							-	-	8,768.70	8,768.70
166	Feb-20							-	-	8,768.70	8,768.70
167	Mar-20							-	-	8,768.70	8,768.70
168	Apr-20							-	-	8,768.70	8,768.70
169	May-20							-	-	8,768.70	8,768.70

170
 171 **History truncated for ease of viewing**

- 172 **NOTES**
 173 **1** - No interest is applied to this activity.
 174 **2** - Payments made in:
 175 October 2019 - see Order 19-325
 176 **3** - Transferred \$90,619 of CUB June balance to 186286 amortization account.
 177 Transferred \$113,900 of AWEC June balance to 186288 amortization account.
 178

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of CUB Intervenor Funding
 Account Number: 186276
 Docket UM 1101
 Last deferral reauthorization was approved in Order No. 19-250

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

158	Jun-19		0.00			0.00	101,125.00
159	Jul-19		0.00			0.00	101,125.00
160	Aug-19		0.00			0.00	101,125.00
161	Sep-19		0.00			0.00	101,125.00
162	Oct-19		0.00			0.00	101,125.00
163	Nov-19	2	0.00	(101,125.00)		(101,125.00)	0.00
164	Dec-19		0.00			0.00	0.00
165	Jan-20		101,125.00			101,125.00	101,125.00
166	Feb-20		0.00			0.00	101,125.00
167	Mar-20		0.00			0.00	101,125.00
168	Apr-20		0.00			0.00	101,125.00
169	May-20		0.00			0.00	101,125.00

170

171 **History truncated for ease of viewing**

172

173 **NOTES**

174 **1** - No interest is applied to this activity.

175 **2** - June balance transferred to account 186286 for amortization.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of AWEC Intervenor Funding
 Account Number: 186278
 Docket UM 1101
 Last deferral reauthorization was approved in Order No. 19-250

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

158	Jun-19		0.00			0.00	30,175.92
159	Jul-19		0.00			0.00	30,175.92
160	Aug-19		0.00			0.00	30,175.92
161	Sep-19		0.00			0.00	30,175.92
162	Oct-19	2	10,202.07			10,202.07	40,377.99
163	Nov-19	3	0.00	(30,176)		(30,175.92)	10,202.07
164	Dec-19		0.00			0.00	10,202.07
165	Jan-20		0.00			0.00	10,202.07
166	Feb-20		0.00			0.00	10,202.07
167	Mar-20		0.00			0.00	10,202.07
168	Apr-20		4,450.33			4,450.33	14,652.40
169	May-20		0.00			0.00	14,652.40

170

171 **History truncated for ease of viewing**

172

173 **NOTES**

174 **1** - No interest is applied to this activity.

175 **2** - Payments made in:

176 October 2019 - see order 19-330

177 **3** - June balance transferred to account 186288 for amortization.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of CUB Intervenor Funding
 Account Number: 186286
 Dockets UM 1101 and UG 374
 Amortization of 2018-19 deferral approved in Order 19-354

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							
171	Jun-19		(4,541.56)		48.28	2.92%	(4,493.28)	17,620.20
172	Jul-19		(3,367.76)		38.78	2.92%	(3,328.98)	14,291.22
173	Aug-19		(2,735.34)		31.45	2.92%	(2,703.89)	11,587.33
174	Sep-19		(2,954.11)		24.60	2.92%	(2,929.51)	8,657.82
175	Oct-19		(7,170.19)		12.34	2.92%	(7,157.85)	1,499.97
176	Nov-19 old rates		(7,712.13)		(5.73)	2.92%	(7,717.86)	(6,217.89)
177	Nov-19 new rates (1)		(7,765.50)	191,744.47	585.50	3.74%	184,564.47	178,346.58
178	Dec-19		(29,602.17)		509.72	3.74%	(29,092.45)	149,254.13
179	Jan-20		(32,049.00)		415.23	3.74%	(31,633.77)	117,620.36
180	Feb-20		(26,621.70)		325.10	3.74%	(26,296.60)	91,323.76
181	Mar-20		(25,435.49)		244.99	3.74%	(25,190.50)	66,133.26
182	Apr-20		(19,906.02)		175.10	3.74%	(19,730.92)	46,402.34
183	May-20		(10,653.85)		128.02	3.74%	(10,525.83)	35,876.51

184
 185 **History truncated for ease of viewing**

186
 187 **NOTES**

188 **1** - Transferred in authorized balances from CUB Deferral account 186276 and Issue Fund Deferral account 186284.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of AWEC Intervenor Funding
 Account Number: 186288
 Dockets UM 1101 and UG 374
 Amortization of 2018-19 deferral approved in Order 19-354

1	Debit	(Credit)						
2								
3						Interest		
4	Month/Year	Note	Amortization	Transfers	Interest	rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
6								
7	Beginning Balance							
155	Jun-19		(5,015.81)		77.61	2.92%	(4,938.20)	29,465.77
156	Jul-19		(5,263.22)		65.30	2.92%	(5,197.92)	24,267.85
157	Aug-19		(5,380.36)		52.51	2.92%	(5,327.85)	18,940.00
158	Sep-19		(5,377.69)		39.54	2.92%	(5,338.15)	13,601.85
159	Oct-19		(6,405.88)		25.30	2.92%	(6,380.58)	7,221.27
160	Nov-19 old rates		(439.86)		17.04	2.92%	(422.82)	6,798.45
161	Nov-19 new rates (1)		(12,405.40)	144,075.92	429.70	3.74%	132,100.22	138,898.67
162	Dec-19		(13,496.92)		411.87	3.74%	(13,085.05)	125,813.62
163	Jan-20		(14,074.95)		370.19	3.74%	(13,704.76)	112,108.86
164	Feb-20		(13,087.60)		329.01	3.74%	(12,758.59)	99,350.27
165	Mar-20		(13,945.84)		287.91	3.74%	(13,657.93)	85,692.34
166	Apr-20		(11,949.37)		248.45	3.74%	(11,700.92)	73,991.42
167	May-20		(10,865.40)		213.67	3.74%	(10,651.73)	63,339.69

History truncated for ease of viewing

NOTES

1 - Transferred in authorized balances from NWIGU Deferral account 186278 and Issue Fund Deferral account 186284.



UM 1101

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO
DEFER CERTAIN EXPENSES OR REVENUES**

June 24, 2020

To All Parties Participating in UG 388:

Please be advised that on June 24, 2020, Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for reauthorization to defer costs associated with Intervenor Funding Grants.

This is not a rate case. The purpose of this Notice is to inform parties participating in the Company's most recent general rate case, UG 388, that a Reauthorization of Deferral Application has been 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: Kyle Walker, CPA
250 Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7051**

**Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, Oregon 97308-1088
Telephone: (503) 373-0886**

Any person may submit to the Commission written comments on this matter within 25 days of this filing. The granting of this Reauthorization of Deferral 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
UM 1101**

I hereby certify that on June 24, 2020, I have served by electronic mail the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER CERTAIN EXPENSES OR REVENUES FOR INTERVENOR FUNDING GRANTS upon all parties of record for the Company's most recent general rate case, UG 388.

UG 388

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DATED June 24, 2020, Portland, OR.

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