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June 26, 2018

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 Pursuant to ORS 757.259 - 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 Expenses for Intervenor Funding Grants.

A Notice concerning this Application will be sent to all parties participating in the Company’s current general rate case, UG 344. 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) 226.4211, ext. 5858.

Sincerely,

/s/ Kyle Walker, CPA

Kyle Walker, CPA
Rates/Regulatory Affairs Analyst

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1101

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba, NW NATURAL

For Reauthorization to Defer Certain
Expenses or Revenues Pursuant to
ORS 757.259

Application

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, 2018, through June 30, 2019.

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

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

6 Moreover, ORS 757.072(4) provides:

7 "The commission shall allow a public utility that provides
8 financial assistance under this section to recover the
9 amounts so provided in rates. The commission shall allow a
10 public utility to defer inclusion of those amounts in rates as
11 provided in ORS 757.259 if the public utility so elects."
12

13 ORS 757.259(3), provides:

14 "Upon request of the public utility, the commission by order
15 shall allow deferral of amounts provided as financial
16 assistance under an agreement entered into under ORS
17 757.072 for later incorporation in rates."
18

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

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

23 On July, 2, 2003, pursuant to Section 2 of the Intervenor Funding Act, the
24 Commission issued Order No. 03-388, which, among other things, approved the
25 Intervenor Funding Agreement among NW Natural, Portland General Electric,
26 PacifiCorp, Cascade Natural Gas Corporation, Avista Corporation, Industrial Customers
27 of Northwest Utilities ("ICNU"), Citizens' Utility Board ("CUB"), Northwest Industrial Gas
28 Users ("NWIGU") (collectively referred to hereafter as "Joint Parties"), dated February 5,

1 2003. The Intervenor Funding Agreement set forth the amount of funding to be
2 contributed by each utility and the procedures for budget submittals by intervenors,
3 Commission approval of budgets, and the payment of grants by utilities.

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

10 On December 29, 2007, the Commission issued Order No. 07-564, which
11 approved amendments to the Intervenor Funding Agreement previously approved in
12 Order No. 03-388. In 2012, Joint Parties executed a Second Amended and Restated
13 Intervenor Funding Agreement which the Commission approved in Order No. 12-452.
14 This Second Amended and Restated Intervenor Funding Agreement, effective January
15 1, 2013, through December 31, 2017, increased the CUB Fund, the Preauthorized
16 Matching Fund, and the Issues Fund by 15% above the levels allowed in prior years.

17 The Commission approved the Third Amended and Restated Intervenor Funding
18 Agreement, effective August 1, 2015 through December 31, 2017, in Order No. 15-335.
19 The amended Intervenor Funding Agreement increased the Issue Fund amount for NW
20 Natural and for Avista Utilities. NW Natural’s Issue Fund amount was changed from
21 \$66,125 to \$143,750.

22 The Commission approved the Fourth Amended and Restated Intervenor
23 Funding Agreement, effective January 1, 2018 through December 31, 2022 in Order No.

1 18-017. The amended Intervenor Funding Agreement increased approximately 45
2 percent in total funds available annually in the CUB Fund, and approximately increased
3 10 percent in total funds available annually in the Preauthorized Matching Funds. In
4 addition, for each Preauthorized Matching Fund, the annual amount for each calendar
5 year after 2018 and during the term of the agreement increase by 3 percent each year.
6 The agreement also now allows the Alliance of Western Energy Consumers¹ to request
7 payment of Preauthorized Matching Grants semi-annually, and lowers the matching
8 amount of internal resources or outside funding from 50 percent to 35 percent.

9 **D. Communications.**

10 Communications regarding this Application should be addressed to:

11 NW Natural
12 e-Filing for Regulatory Affairs
13 220 NW Second Avenue
14 Portland, Oregon 97209-3991
15 Telephone: (503) 226-4211, ext. 3589
16 Facsimile: (503) 721-2516
17 Email: eFiling@nwnatural.com;

18
19 Zachary D. Kravitz (OSB# 152870)
20 Associate Counsel
21 220 NW Second Avenue
22 Portland, Oregon 97209-3991
23 Phone: (503) 220-2379
24 Email: zdk@nwnatural.com;

25
26 and

27
28 Kyle Walker, CPA
29 Rates & Regulatory Affairs
30 220 NW Second Avenue
31 Portland, Oregon 97209-3991
32 Phone: (503) 226-4211 Ext. 5858
33 Email: Kyle.Walker@nwnatural.com

¹ ICNU and NWIGU have merged their organizations and are now the Alliance of Western Energy Consumers ("AWEC").

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

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

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

17 **F. Reasons for Application for Reauthorization of Deferred Accounting – OAR**
18 **860-027-0300(3)(b).**
19

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

25 ///

26 ///

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 2018 are displayed in
9 the table below. The estimated amounts of the Preauthorized Matching Fund will
10 increase by three percent in 2019 amounts:

<u>Fund</u>	
CUB Fund	\$ 101,125
Preauthorized Matching Fund	\$ 72,738
Issue Fund	<u>\$ 143,750</u>
Total	<u>\$ 317,613</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
14 Attached as Exhibit A to this application are work papers detailing the amounts
15 deferred to-date under UM 1101.

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

17 The deferral is forecasted to continue as long as the Commission amends the
18 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 2018 PGA filing work papers and in the
9 electronic file entitled "Proposed Temps Oregon 2018-19 PGA filing.xls."

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

11 This application is for the 12-month period beginning July 1, 2018 and ending
12 June 30, 2019.

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. 17-319.

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

	Issue Fund	CUB Fund	NWIGU Fund
	<u>Acct 186284</u>	<u>Acct 186276</u>	<u>Acct 186278</u>
Deferred amounts July 1, 2017 through May 31, 2018	\$98,710	\$101,125	\$10,142

17 **5. The amount amortized last year.**

	CUB Fund	NWIGU Fund
	<u>Acct 186286</u>	<u>Acct 186288</u>
Amortized amounts November 1, 2017 through May 31, 2018 with interest	\$60,641	\$7,900

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

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

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

8 The Company estimates that it will defer, and ultimately seek to amortize up
9 to \$317,613.

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

11 A notice of this Application has been served on the all parties who are
12 participating in the Company's current general rate case, UG 344, and is attached to
13 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 DATED this 26th day of June 2018.

19 Respectfully Submitted,

20 NW NATURAL

21 /s/ Kyle Walker, CPA
22 Kyle Walker, CPA
23 Rates/Regulatory Analyst

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/s/ Zachary D. Kravitz
Zachary D. Kravitz (OSB# 152870)
Associate Counsel
220 NW Second Avenue
Portland, Oregon 97209-3991
Phone: (503) 220-2379
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 order for deferral reauthorization was Order No. 17-319

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						amort account	amort account				
8	Beginning Balance										
127	Oct-16							0	64,840	52,195	117,034.92
128	Nov-16	3			(56,840)	(46,613)		(103,453)	8,000	5,581	13,581.46
129	Dec-16	2	12,720					12,720	20,720	5,581	26,301.46
130	Jan-17	2		853				853	20,720	6,435	27,154.61
131	Feb-17							0	20,720	6,435	27,154.61
132	Mar-17							0	20,720	6,435	27,154.61
133	Apr-17							0	20,720	6,435	27,154.61
134	May-17							0	20,720	6,435	27,154.61
135	Jun-17	2	7,257					7,257	27,977	6,435	34,411.61
136	Jul-17		17,906					17,906	45,883	6,435	52,317.61
137	Aug-17							0	45,883	6,435	52,317.61
138	Sep-17	2						0	45,883	6,435	52,317.61
139	Oct-17	2	5,242	47,686				52,928	51,125	54,121	105,245.61
140	Nov-17	3			(27,977.00)	(6,434.61)		(34,412)	23,148	47,686	70,834.00
141	Dec-17	2	9,985					9,985	33,133	47,686	80,819.00
142	Jan-18	2		15,021				15,021	33,133	62,707	95,840.00
143	Feb-18							0	33,133	62,707	95,840.00
144	Mar-18	2	2,870					2,870	36,003	62,707	98,710.00
145	Apr-18							0	36,003	62,707	98,710.00
146	May-18							0	36,003	62,707	98,710.00

History truncated for ease of viewing

NOTES

- 2 - Payments made in:
 - December 2016 - see Order 16-498
 - January 2017 - see Order 17-002
 - June 2017 - see order 17-229
 - July 2017 - see order 17-238
 - October 2017 - see Order 17-420 (CUB), Order 17-435 (NWIGU) and Order 17-436 (NWIGU)
 - December 2017 - see Order 17-434 and Order 17-500 (CUB)
 - January 2018 - see Order 18-028
 - March 2018 - see Order 18-099

- 3 - November 2016 - Transfer \$56,840 of CUB June balance to 186286 amortization account
- Transfer \$46,613.46 of NWIGU June balance to 186288 amortization account

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of CUB Intervenor Funding
 Account Number: 186276
 Docket UM 1101
 Last order for deferral reauthorization was Order No. 17-319

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						
126	Oct-16		0			0	66,125
127	Nov-16	3	0	(66,125)		(66,125)	0
128	Dec-16		0			0	0
129	Jan-17	2	66,125			66,125	66,125
130	Feb-17		0			0	66,125
131	Mar-17		0			0	66,125
132	Apr-17		0			0	66,125
133	May-17		0			0	66,125
134	Jun-17		0			0	66,125
135	Jul-17		0			0	66,125
136	Aug-17		0			0	66,125
137	Sep-17		0			0	66,125
138	Oct-17		0			0	66,125
139	Nov-17	3	0	(66,125)		(66,125)	0
140	Dec-17		0			0	0
141	Jan-18	2	101,125			101,125	101,125
142	Feb-18		0			0	101,125
143	Mar-18		0			0	101,125
144	Apr-18		0			0	101,125
145	May-18		0			0	101,125

146
 147 **History truncated for ease of viewing**

148
 149 **NOTES**

- 150 **1** - No interest is applied to this activity
- 151
- 152 **2** - Payments made in:
- 153 Jan 2017 - see order 17-003
- 154 Jan 2018 - see order 18-017
- 155
- 156 **3** - June balance transferred to account 186286 for amortization

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of NWIGU Intervenor Funding
 Account Number: 186278
 Docket UM 1101
 Last order for deferral reauthorization was Order No. 17-319

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						
126	Oct-16		0			0	7,204
127	Nov-16	3	0	(7,204)		(7,204)	0
128	Dec-16		0			0	0
129	Jan-17		0			0	0
130	Feb-17		0			0	0
131	Mar-17		0			0	0
132	Apr-17	2	6,013			6,013	6,013
133	May-17		0			0	6,013
134	Jun-17		0			0	6,013
135	Jul-17		0			0	6,013
136	Aug-17		0			0	6,013
137	Sep-17		0			0	6,013
138	Oct-17		0			0	6,013
139	Nov-17	3	0	(6,013)		(6,013)	0
140	Dec-17		0			0	0
141	Jan-18	2	10,142			10,142	10,142
142	Feb-18		0			0	10,142
143	Mar-18		0			0	10,142
144	Apr-18		0			0	10,142
145	May-18		0			0	10,142

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 147 **History truncated for ease of viewing**

148
 149 **NOTES**

- 150 **1** - No interest is applied to this activity
- 151
- 152 **2** - Payments made in:
- 153 April 2017 - see order 17-130
- 154 January 2018 - see order 18-005
- 155
- 156 **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 327
 Amortization of 2017 deferral approved in Order 17-403 of UG 327

1	Debit	(Credit)						
2								
3								
4	Month/Year	Note	Amortization	Transfers	Interest	Interest rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
6								
7	Beginning Balance							
136	Oct-16		(4,895)		32	1.93%	(4,863)	17,498
137	Nov-16 old rates		(4,489)		25	1.93%	(4,464)	13,034
138	Nov-16 new rates (1)		(4,281)	122,965	222	2.20%	118,905	131,939
139	Dec-16		(22,187)		222	2.20%	(21,966)	109,973
140	Jan-17		(35,219)		169	2.20%	(35,049)	74,924
141	Feb-17		(26,875)		113	2.20%	(26,762)	48,162
142	Mar-17		(20,319)		70	2.20%	(20,250)	27,912
143	Apr-17		(14,761)		38	2.20%	(14,724)	13,188
144	May-17		(10,415)		15	2.20%	(10,401)	2,787
145	Jun-17		(5,514)		0	2.20%	(5,514)	(2,726)
146	Jul-17		(3,675)		(8)	2.20%	(3,683)	(6,410)
147	Aug-17		(2,877)		(14)	2.20%	(2,891)	(9,301)
148	Sep-17		(3,269)		(20)	2.20%	(3,289)	(12,591)
149	Oct-17		(6,409)		(29)	2.20%	(6,438)	(19,028)
150	Oct-17 old rates		(6,844)		(41)	2.20%	(6,885)	(25,913)
151	Nov-17 new rates (1)		(3,023)	94,102	184	2.38%	91,263	65,349
152	Dec-17		(11,289)		118	2.38%	(11,171)	54,179
153	Jan-18		(13,763)		94	2.38%	(13,669)	40,509
154	Feb-18		(10,128)		70	2.38%	(10,057)	30,452
155	Mar-18		(10,919)		50	2.38%	(10,870)	19,582
156	Apr-18		(7,958)		31	2.38%	(7,927)	11,655
157	May-18		(4,126)		19	2.38%	(4,107)	7,548

158 **NOTES**

159 **1** - Transfer in represents June balances of deferral accounts 186276 and 186284.
 160

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of NWIGU Intervenor Funding
 Account Number: 186288
 Dockets UM 1101 and UG 327
 Amortization of 2017 deferral approved in Order 17-403 of UG 327

1	Debit	(Credit)						
2								
3								
4	Month/Year	Note	Amortization	Transfers	Interest	Interest rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(e2)	(f)	(g)
6								
7	Beginning Balance							
120	Oct-16		(4,160)		9	1.93%	(4,150)	3,631
121	Nov-16 old rates		(198)		6	1.93%	(193)	3,438
122	Nov-16 new rates (1)		(4,279)	53,818	95	2.20%	49,634	53,072
123	Dec-16		(5,106)		93	2.20%	(5,014)	48,059
124	Jan-17		(5,471)		83	2.20%	(5,388)	42,670
125	Feb-17		(4,825)		74	2.20%	(4,752)	37,919
126	Mar-17		(4,979)		65	2.20%	(4,914)	33,004
127	Apr-17		(4,612)		56	2.20%	(4,556)	28,448
128	May-17		(4,761)		48	2.20%	(4,714)	23,735
129	Jun-17		(4,393)		39	2.20%	(4,354)	19,381
130	Jul-17		(4,212)		32	2.20%	(4,180)	15,201
131	Aug-17		(4,219)		24	2.20%	(4,195)	11,006
132	Sep-17		(4,188)		16	2.20%	(4,171)	6,835
133	Oct-17		(4,670)		8	2.20%	(4,661)	2,173
134	Nov-17 old rates		(243)		4	2.20%	(240)	1,934
135	Nov-17 new rates (1)		(1,064)	12,448	24	2.38%	11,408	13,341
136	Dec-17		(1,210)		25	2.38%	(1,185)	12,157
137	Jan-18		(1,219)		23	2.38%	(1,196)	10,961
138	Feb-18		(1,102)		21	2.38%	(1,081)	9,879
139	Mar-18		(1,236)		18	2.38%	(1,217)	8,662
140	Apr-18		(1,115)		16	2.38%	(1,099)	7,563
141	May-18		(1,096)		14	2.38%	(1,082)	6,481

143 History truncated for ease of viewing

144 **NOTES**

145 1 - Transfer in represents June balances of deferral accounts 186278 and 186284.



UM 1101

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

June 26, 2018

To All Parties Participating in UG 344

Please be advised that on June 26, 2018 Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for Reauthorization to Defer Certain Expenses or Revenues pursuant to provisions of ORS 757.259. A copy of the Company's application is available for inspection at its main office or at the Public Utility of Oregon's ("Commission") eDocket website.

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 344, that a Reauthorization Deferral 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 Commission as follows:

NW Natural
Attn: Kyle Walker, CPA
220 NW Second Avenue
Portland, Oregon 97209-3991
Telephone: (503) 226-4211 ext 5858

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, Oregon 97308-1088
Telephone: (503) 378-6636

Any person may submit to the Commission written comments on this matter by July 26, 2018. 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 26, 2018, I have served by electronic mail the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER CERTAIN EXPENSES OR REVENUES PURSUANT TO ORS 757.259 upon all parties of record in docket UG 344, which is the Company's current general rate case.

UG 344

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DATED June 26, 2018, Portland, OR.

/s/ Erica Lee-Pella
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