



October 1, 2012

*VIA ELECTRONIC FILING*

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

Attention: Filing Center

**Re: OPUC Docket No. UG 221 – Northwest Natural Gas Company  
Application for a General Rate Revision - Attestations filed Pursuant to Partial  
Stipulation**

On July 9, 2012, several parties to the above-captioned proceeding filed a Partial Stipulation, proposing an agreed upon resolution to various issues in the case. Under the terms of that Partial Stipulation, NW Natural agreed to file attestations by October 1<sup>st</sup> regarding several of the capital projects at issue in the case, affirming that such projects are or will be used and useful by the rate effective date (November 1, 2012), and confirming the amount that the Company has invested in each of those projects as of the date of the filing, and its reasonable expectation of costs that will be incurred up to the rate effective date.

In accordance with the Partial Stipulation, NW Natural files with this letter the following attestations:

- Attestation of Lea Anne Doolittle, Senior Vice President, regarding the “Tualatin Replacement” facility and “2012 Generators”;
- Attestation of Grant Yoshihara, Vice President of Utility Operations and Chief Engineer, regarding the “Perrydale to Monmouth,” “Monmouth Reinforcement,” and “Portland System Optimization, Phase I” projects; and
- Attestation of Barbara Volk, Managing Director Information Services, regarding “Unified Communications Phase I” and “Nertec replacement meters.”

All amounts shown in the attached attestations exclude construction overhead, and represent the direct costs spent, or projected to be spent, on the various projects by the rate effective date. NW Natural understands that for purposes of determining the appropriate amounts included in rate base, the amounts shown in the attached attestations will, under the terms of the Stipulation, be compared to, and limited by, the

amounts included for such projects in NW Natural's original application for a general rate revision, as well as other applicable terms in the Partial Stipulation.

Although the Partial Stipulation provides for an attestation regarding the amounts spent on the "Salem Retrofit," NW Natural has not included an attestation on that project and is not requesting that costs associated with the project be added to rate base at this time, in light of the fact that the project has been delayed due to permit delays and considerable unexpected design and research work related to seismic upgrades that may be required.

Please do not hesitate to call if you have questions or desire further information.

Sincerely,

**NW Natural**

A handwritten signature in cursive script, appearing to read "Mark R. Thompson".

Mark R. Thompson  
Manager, Rates & Regulatory Affairs  
(503) 721-2476  
[mrt@nwnatural.com](mailto:mrt@nwnatural.com)

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 221**

4 In The Matter of  
5 NORTHWEST NATURAL GAS COMPANY  
6 Application for a General Rate Revision

**ATTESTATION OF  
LEA ANNE DOOLITTLE**

7 STATE OF OREGON )  
8 County of Multnomah ) ss  
9 )

10 I, Lea Anne Doolittle, being first duly sworn on oath, depose and say:

11 1. My name is Lea Anne Doolittle and I am employed by NW Natural Gas Company  
12 ("NW Natural") as Senior Vice President.

13 2. I am making this attestation in compliance with Paragraphs 11, 12, 15, and 16 of  
14 the Partial Stipulation filed in this docket on July 9, 2012.

15 3. I attest that the following projects will be used and useful on or before October  
16 31, 2012: Tualatin Replacement and the 2012 Generators

17 4. I confirm that the amounts that the Company has invested in these projects as of  
18 this date and the Company's reasonable expectation of costs that will be incurred by  
19 October 31, 2012 are as follows:

20

<b>Project</b>	<b>Amount of Investment</b>
21 Tualatin Replacement:	Invested through August 2012: \$8.395M 22 Investment forecast for September 2012: \$1.926M Investment forecast for October 2012: \$ .938M 23 Total investment forecast through October 31, 2012: \$11.259M
24 2012 Generators:	Invested through August 2012: \$ 117K Investment forecast for September 2012: \$252K 25 Investment forecast for October 2012: \$ N/A Total investment forecast through October 31, 2012: \$369K
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1 I declare under penalty of perjury under the laws of the state of Oregon that the  
2 foregoing is true and correct based on my information and belief.

3 SIGNED this 1st day of October, 2012, at Portland, Oregon.

4 Signed: *Lea Anne Doolittle*

5 SUBSCRIBED AND SWORN to before me this 1st day of October, 2012.

6  
7 *Laura L Killam*  
8 Notary Public, State of Oregon  
9 My Commission Expires *July 26, 2013*



1                               **BEFORE THE PUBLIC UTILITY COMMISSION**  
2                                               **OF OREGON**

3                                                       **UG 221**

4 In The Matter of  
5 **NORTHWEST NATURAL GAS COMPANY**  
6 Application for a General Rate Revision

**ATTESTATION OF GRANT YOSHIHARA**

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8 STATE OF OREGON                     )  
9 County of Multnomah               ) ss  
                                                      )

10           I, Grant Yoshihara, being first duly sworn on oath, depose and say:

11           1.       My name is Grant Yoshihara and I am employed by NW Natural Gas Company  
12 ("NW Natural") as Vice President of Utility Operations and Chief Engineer.

13           2.       I am making this attestation in compliance with Paragraphs 11, 12, and 13 of the  
14 Partial Stipulation filed in this docket on July 9, 2012.

15           3.       I attest that Perrydale to Monmouth and the Monmouth Reinforcement will both  
16 be used and useful on or before October 31, 2012 as will two projects within Portland System  
17 Optimization Phase I.

18           4.       I confirm that the amounts that the Company has invested in these projects as of  
19 this date and the Company's reasonable expectation of costs that will be incurred by  
20 October 31, 2012 are as follows:

21

<b>Project</b>	<b>Amount of Investment</b>
Perrydale to Monmouth	Invested through August 2012: \$9.264M Investment forecast for September 2012: \$2.952M Investment forecast for October 2012: \$ .049M Total investment forecast through October 31, 2012: \$12.265M
Monmouth Replacement	Invested through August 2012: \$6.228M Investment forecast for September 2012: \$ .200M Investment forecast for October 2012: \$1.078M Total investment forecast through October 31, 2012: \$7.506M

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1 2 3	Portland System Optimization Phase I:  Used and useful projects.	Invested through August 2012: \$116K Investment forecast for September 2012: \$45K Investment forecast for October 2012: \$30K Total investment forecast through October 31, 2012: \$191K
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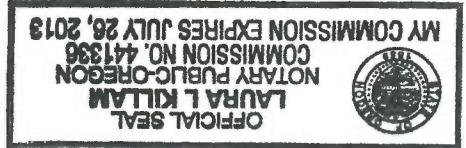
4  
5 I declare under penalty of perjury under the laws of the state of Oregon that the  
6 foregoing is true and correct based on my information and belief.

7 SIGNED this 1st day of October, 2012, at Portland, Oregon.

8 Signed: *Grant Yoshihara*

9 SUBSCRIBED AND SWORN to before me this 1st day of October, 2012.

10  
11 *Laura L. Killam*  
Notary Public, State of Oregon  
My Commission Expires *July 26, 2013*



1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 221**

4 In The Matter of  
5 NORTHWEST NATURAL GAS COMPANY  
6 Application for a General Rate Revision

**ATTESTATION OF  
BARBARA VOLK**

7 STATE OF OREGON )  
8 ) ss  
9 County of Multnomah )

10 I, Barbara Volk, being first duly sworn on oath, depose and say:

11 1. My name is Barbara Volk and I am employed by NW Natural Gas Company  
12 ("NW Natural") as Managing Director Information Services.

13 2. I am making this attestation in compliance with Paragraphs 11, 12, and 14 of the  
14 Partial Stipulation filed in this docket on July 9, 2012.

15 3. I attest that the Unified Communications Phase I project is currently used and  
16 useful.

17 4. I confirm that the amounts that the Company has invested in this project as of  
18 this date and the Company's reasonable expectation of costs that will be incurred by  
19 October 31, 2012 are as follows:

20

<b>Project</b>	<b>Amount of Investment</b>
21 Unified Communication Phase I:	Invested through August 2012: \$1.886M
	Investment forecast for September 2012: \$ .094M
	Investment forecast for October 2012: \$ .378M
	Total investment forecast through October 31, 2012: \$2.358M

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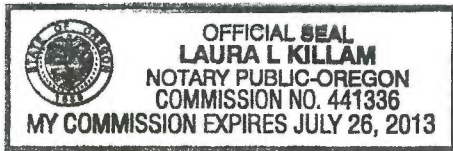
24 5. I attest that an initial shipment of Nertec replacement meters has been received  
25 and the remainder will be received by October 31, 2012. The meters will be installed by the end  
26 of the Test Period, which is November 1, 2012 - October 31, 2013.

1 I declare under penalty of perjury under the laws of the state of Oregon that the  
2 foregoing is true and correct based on my information and belief.

3 SIGNED this 1st day of October, 2012, at Portland, Oregon.

4 Signed: Barbara Volk

5 SUBSCRIBED AND SWORN to before me this 1st day of October, 2012.



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Laura L. Killam  
Notary Public, State of Oregon  
My Commission Expires July 26, 2013



CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in UG 221 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

OPUC Dockets  
Citizens' Utility Board Of Oregon  
dockets@oregoncub.org

G. Catriona Mccracken  
Citizens' Utility Board Of Oregon  
catriona@oregoncub.org

Judy Johnson  
Public Utility Commission of Oregon  
judy.johnson@state.or.us

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Paula E. Pyron  
Northwest Industrial Gas Users  
ppyron@nwigu.org

Dated: October 1, 2012

  
\_\_\_\_\_  
Wendy McIndoo  
Office Manager