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October 5, 2012

VIA ELECTRONIC FILING
& FIRST CLASS MAIL

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

Re: ***In the Matter of the Northwest Natural Gas Company Application for General Rate Case* -- Docket No. UG 221**

Dear Filing Center:

Enclosed for filing in the above-referenced matter, please find an original and one (1) copy of the **Northwest Industrial Gas Users' And Citizens' Utility Board Of Oregon's Joint Supplemental Post-Hearing Brief.**

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,

Tommy A. Brooks

cc: UG 221 Service List (via e-mail)

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 221

In the Matter of NORTHWEST NATURAL GAS COMPANY Application for a General Rate Revision	)))))))	NORTHWEST INDUSTRIAL GAS USERS' AND CITIZENS' UTILITY BOARD OF OREGON'S JOINT SUPPLEMENTAL POST-HEARING BRIEF

I. INTRODUCTION

Pursuant to ALJ Hardie's Corrected Prehearing Conference Memorandum dated September 20, 2012, the Northwest Industrial Gas Users ("NWIGU") and the Citizens' Utility Board of Oregon ("CUB") hereby submit this Joint Supplemental Post-Hearing Brief. The purpose of this brief is to address the Second Bench Request ("Bench Request") and issues raised by NW Natural's Response to Second Bench Request ("Response").

As noted by ALJ Hardie, the Bench Request seeks information related only to NW Natural Gas Company's ("NW Natural" or "Company") historical actions regarding pensions and does not alter the specific legal or policy decisions that are pending before the Commission and which the parties have briefed extensively.[1] Indeed, the Response merely reinforces the fact that NW Natural attempts here to recover out-of-period pension expenses pre-dating the test year by nearly a decade. Notwithstanding that fact, the Response overstates the impact of NW Natural's out-of-period pension contributions on its FAS 87 expense. Moreover, the Response improperly seeks to expand the basis for recovery that NW Natural originally sought in this proceeding. NWIGU and CUB address both of those issues in more detail below.

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[1] *In re Northwest Natural Gas Co. dba NW Natural*, UG 221, Ruling (Oct. 2, 2012).

II. ISSUES

A. The Response Overstates the Impact to Test Year FAS 87 Expense

The Bench Request asked the Company to estimate the effect on Test Period FAS 87 pension expense that is the direct result of pension contributions the Company made in calendar years 2008-2011. In its Response, NW Natural provided an estimate for each calendar year, calculating the amount in part based on its actual return on assets for the relevant time period.[2] This is not the appropriate rate to use for determining impacts to FAS 87 expense because using actual returns ignores the fact that more recent investments would be receiving a lower rate of return,[3] which in turn would lower the Company's pension contributions and cause a corresponding increase in FAS 87 expense from the Company's current estimates.

NWIGU and CUB submitted a data request to the Company asking it to recalculate the impact on FAS 87 expense using the lowest rate of return on investment for each of the years 2008-2011.[4] The Company's response recalculated the FAS 87 expense using the lowest single rate that existed for all of those years combined instead of for each year. Nevertheless, the recalculation demonstrates that if the Company had used the lower rate of return in its Response, the total impact on FAS 87 expense would be a decrease of $4,151,110 instead of the $6,766,662 that appears in the Response.

The Company should have used the lower rate of return because the incremental pension contribution investments were made during the recession and would have received a much lower rate of return than the embedded assets from previous years.

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[2] See Pension Contributions Impact on FAS 87 Expense.xls, referenced on page 3 line 7 of the Response and attached thereto.

[3] For example Treasury Notes paid a rate of 2.264 in October 2011, 2.540 in October 2010, 3.021 in October 2009, and 4.009 in October 2008. See www.treasurydirect.gov.

[4] See NW Natural's Response to NWIGU/CUB DR No. 184. Each of the joint data requests and the Company's responses to those requests are part of NWIGU and CUB's Ninth Set of Joint Data Requests, the non-confidential version of which is attached as Exhibit A to this supplemental post-hearing brief.

B. The Response Improperly Attempts to Expand the Scope of the Requested Recovery

In addition to the estimated impact on FAS 87 pension expenses directly resulting from contributions the Company made during the years 2009 through 2011, the Company's Response also describes impacts from contributions made in 2004, 2005, and 2012, which were not requested by the Commission, and presented arguments for why those alleged impacts should be taken into consideration.

First, the Commission should not give any weight to these new arguments and evidence because they are outside the scope of the Bench Request and were submitted after the record was closed.

Second, NW Natural's request that the 2004 and 2005 payments be taken into consideration is a last minute attempt to expand the basis for its request that the Commission revise the method of recovering pension contributions, and it further highlights the retroactive nature of NW Natural's request. Specifically, NW Natural has vigorously argued that the increased amounts of its pension contributions were the result of the federal Pension Protection Act ("PPA") and financial markets in 2008 and 2009:

> As a result of the Pension Protection Act of 2006 (PPA) and the financial crisis of 2008 and 2009, the Company has been obligated to make large pension contributions that it otherwise would not have been forced to make.[5]

In other words, the entire theory behind the Company's request is that it was forced to make larger contributions than it otherwise would have under the normal FAS 87 process that was in place as of the Company's last general rate case and that the recovery mechanism should therefore be changed. However, the payments made in 2004 and 2005 do not fall within that category of expenses because they were made prior to the enactment of the PPA in 2006. Because those contributions were part of the FAS 87 process in place at that time, the Company would have already begun recovery of those

[5] See, e.g. NW Natural's Posthearing Brief, page 28.

expenses, and the Company has provided no evidence with respect to the amount of the contributions that it has already recovered.

Moreover, the Company's expanded arguments further highlight the fact that pension contributions are different than other types of pre-payments that may be appropriate to include in rate base because they are divorced from any particular time period other than the moment in which the contributions are made. The Company has not, and cannot, show when the contributions will be used to meet pension fund obligations because, in the Company's own words, contributions may be used to pay current expenses or future expenses.[6] The prior contributions, therefore, may have been used to pay obligations that predate the rate effective year and are not part of an ongoing expense, as the Company suggests, and are not part of any future expense that can be specifically timed.

In addition, the 2004 and 2005 pension contributions, as well as the 2008 and 2009 contributions, were made prior to the Company filing for a deferral in UM 1415 in 2010. While the Company claims that the 2004 and 2005 contributions were not "the basis" for the Company's request for the balancing account in that docket,[7] the record in that matter clearly indicates that those contributions were addressed as part of that proceeding. In its application initiating docket UM 1415, one of the reasons NW Natural gave for seeking the deferral was the pension contributions going back to 2004, specifically noting that the Company had "significantly increased our cash contributions to cover higher pension liabilities, including a cumulative $74.3 million in cash contributions to our qualified defined benefit plans from September 2004 through March 2010."[8]

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[6] NWN/400, Feltz/22 line 17,
[7] See NW Natural's Response to NWIGU/CUB DR No. 182.
[8] APPLICATION FOR DEFERRED ACCOUNTING ORDER RE PENSION COSTS, UM 1415, page 4, lines 2-5.

Based on the evidence in that docket, parties reached a settlement and agreed to a balancing account for pensions. One clause of that UM 1415 stipulation is particularly instructive:

> NW Natural is free to request in its next rate case that the Commission give consideration to the effect of its pension contributions since the last rate case *in setting the Company's capital structure*.[9]

Beyond this agreement that NW Natural could argue for a different *capital structure* in this rate case, the settlement resolved issues related to the prior contributions going back to 2004 that the Company cited in its application and in its testimony. Thus, the balancing account settled the prior issues related to prior pension contributions since the last rate case, except for that one carve out – NW Natural could argue in this rate case that the pension contributions had an effect on its capital structure. The Commission approved this stipulation last year in Order No 11-051.

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[9] UM 1415, Stipulation, page 4, Item No. 6 (emphasis added).

III. CONCLUSION

Based on the foregoing, and based on the briefs already submitted by NWIGU and CUB in the proceeding, NWIGU and CUB urge the Commission to reject NW Natural's proposal to include out-of-period pension contributions in rate base.

Respectfully submitted this 5th day of October, 2012

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NW Natural

Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR 1-NWIGU-CUB-DR 181:

Please refer to NW Natural's response to 2nd Bench Request, Question 1.

A. Are each of the contributions shown in the response to 2nd Bench Request comprised of an FAS 87 minimum contribution and a minimum contribution required pursuant to the Pension Protection Act ("PPA")?

   1 If the answer is yes and a FAS 87 contribution was required:
      a. for each of the contributions listed, identify the portion of the contribution required under FAS 87; and
      b. for each of the contributions listed, identify the portion of the contribution required pursuant to the PPA.

   2 If no FAS 87 contribution was required, please state why.

B. For each of the years 2008 through 2011, provide the actuarial recommended contributions pursuant to FAS 87.

C. For each of the years 2008 through 2011, provide the actuarial recommended contributions pursuant to the PPA.

Response: 9/26/2012

A. FAS 87 is the accrual accounting standard for measuring annual pension expense and for reporting pension liabilities. However, it does not determine the amount of minimum contribution requirements. For that reason, none of the contributions shown in response to the Second Bench Request is comprised of a "FAS 87 minimum contribution." Minimum contribution requirements for pension plans are determined by federal IRS regulations, and these regulations were modified by the Pension Protection Act of 2006 (PPA).

   All contributions shown in response to the Second Bench Request constitute the minimum (or approximate minimum) contribution necessary to avoid benefit restrictions in the form of lump sum payout, and higher Pension Benefit Guarantee Corporation (PBGC) premiums under the PPA.

   Contributions in excess of the Minimum Required Contributions (MRC) under the PPA were generally required to be made in order to avoid potential benefit restrictions under the PPA. Please see page 4 of Stipulation adopted in Order No. 11-051 (UM 1475), where NW Natural and the parties agreed that "the Company will make whatever capital contributions are required to maintain compliance with PPA requirements including the avoidance of benefit restrictions." Certain required contributions were made in advance of required due dates to avoid potential benefit restrictions under the PPA and to satisfy MRCs under the PPA, while reducing premiums to the PBGC and allowing for some flexibility in cash flow timing. For example, a portion of the $25,000,000 contribution on April 1, 2009 satisfied required contributions that otherwise would have been due on April 15, 2009, July 15, 2009, September 15, 2009, October 15, 2009, and January 15, 2010.

April 1, 2009 $25,000,000: This was required to be made in order to avoid potential benefit restrictions under the PPA and to satisfy MRCs under the PPA.

March 1, 2010 $10,000,000: This was required to be made in order to avoid potential benefit restrictions under the PPA and satisfy MRCs under the PPA.

January 14, 2011 $1,645,000: This was required to be made in order to satisfy MRCs under the PPA.

February 28, 2011 $2,000,000: This was required to be made in order to avoid benefit restrictions under the PPA and satisfy MRCs under the PPA.

March 31, 2011 $10,000,000: This was required to be made in order to avoid benefit restrictions under the PPA and satisfy MRCs under the PPA.

April 14, 2011 $2,800,000: This was required to be made in order to satisfy MRCs under the PPA.

July 15, 2011 $2,800,000: This was required to be made in order to satisfy MRCs under the PPA

October 14, 2011 $1,000,000: This was required to be made in order to satisfy MRCs under the PPA.

January 13, 2012 $2,800,000: This was required to be made in order to satisfy MRCs under the PPA.

March 30, 2012 $11,000,000: This was required to be made in order to avoid benefit restrictions under the PPA, and satisfy MRCs under the PPA.

April 13, 2012 $4,600,000: This was required to be made in order to satisfy MRCs under the PPA.

July 13, 2012 $4,500,000: This was required to be made in order to satisfy MRCs under the PPA.

September 14, 2012 $600,000: This was required to be made in order to avoid ERISA Section 4010 Reporting with the Pension Benefit Guarantee Committee, as certain pre-PPA ERISA Section 4010 filing requirements were replaced by the PPA.

B. There are no "actuarial recommended contributions pursuant to FAS 87." Please refer to the response to subsection A above.

C. The Company made the contributions determined by its actuaries for each of the years 2008-2011, so the actuarially-determined contributions and actual contributions were the same. Additionally, the actuary recommends contribution requirements based on funding results under the PPA and the goals of the plan sponsor. All contributions listed in the response to subsection A above are supported by the actuary based on the plan sponsor's goals of avoiding benefit restrictions under the PPA, satisfying minimum required contributions under the PPA, and occasional advance contributions to satisfy these two goals as well as to reduce PBGC premiums and allow for some flexibility in cash flow timing.

NW Natural

Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR 1-NWIGU-CUB-DR 182:

Please refer to NW Natural's response to 2nd Bench Request, Question 2.

A. Were the contributions to the plan in 2004 and 2005 what formulated the basis for the
Company's request for the initial establishment of its pension balancing account?

B. If the answer to A is no, please describe the circumstances which led to the initial establishment of the pension balancing account.

Response: 9/26/2012

A. No, the 2004 and 2005 contributions were not the basis for the Company's request for the initial establishment of its pension balancing account. Instead, many factors (including the passage of the PPA and the economic crisis) motivated the Company to request a balancing account in UM 1475, which addresses the recovery of FAS 87 expense—not a return on or of contributions. For details, please see the testimony filed in that case by Alex Miller and Steve Feltz. Regarding the 2004 and 2005 contributions, these contributed to the current prepaid asset, and at the same time they served to lower FAS 87 expense in the ensuing years.

B. Please refer to the response to subsection A above.

NW Natural

Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR 1-NWIGU-CUB-DR 183:

Please refer to NW Natural's response to 2nd Bench Request, Question 2.

A. Provide a detailed explanation of how the trustee invested the incremental contributions.

B. Provide the actual rate of return earned in each of the years shown on the attachment titled "FAS 87 Expense.xls"

Response: 9/26/2012

A. The Company objects to this request on the basis that it is not relevant to the Second Bench Request. In addition, the use of the phrase "incremental contributions" in this context is vague and ambiguous, and the Company does not understand this reference. Notwithstanding these objections, the Company responds as follows:

The Company invests its pension contributions within its Investment Policy and in accordance with the target asset allocation disclosed in the Company's annual Form 10-K filing with the Securities and Exchange Commission. See, for example, page 93 of the Company's 2011 Form 10-K.

B. Please refer to Row 11 of the referenced spreadsheet.

NW Natural

Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR 1-NWIGU-CUB-DR 184:

Refer to NW Natural's response to 2nd Bench Request, Question 2.

A. Please update the impact on FAS 87 on the attachment titled "FAS 87 Expense.xls" using the highest rate of return earned on the incremental contributions in the years shown.

B. Please update the impact on FAS 87 on the attachment titled "FAS 87 Expense.xls" using the median rate of return earned on the incremental contributions in the years shown.

C. Please update the impact on FAS 87 on the attachment titled "FAS 87 Expense.xls" using the lowest rate of return earned on the incremental contributions in the years shown.

Response: 9/26/2012

The Company objects to this request on the basis that is not relevant to the information requested by the Second Bench Request. Notwithstanding this objection, the Company responds as follows:

A. Please see Confidential Attachment NWIGU-CUB DR 184, specifically the tab in the worksheet titled, "Response to DR184A."

B. Please see Confidential Attachment NWIGU-CUB DR 184, specifically the tab in the worksheet titled, "Response to DR184B."

C. Please see Confidential Attachment NWIGU-CUB DR 184, specifically the tab in the worksheet titled, "Response to DR184C."

NW Natural

Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR 1-NWIGU-CUB-DR 185:

Refer to NW Natural's response to 2nd Bench Request, Question 2, and the attachment titled "FAS 87 Expense.xls", specifically the tab in the worksheet titled, "Conf. Detailed calculations."

A. Provide an explanation of what the acronym "CPW" refers to in cell AI.

B. What does "contributions Scott" refer to in cell AI?

C. Provide a detailed explanation of what the $1,800,000 "variance from Scott" represents.

D. In Column M, which is highlighted in green, why are there no amounts for the gain/loss amortizations for 2010 and 2011? (i.e., cells, M 113, M 133, and M 138.)

Response: 9/26/2012

A. "CPW" refers to Cash Position Worksheet. This section of the AON Hewitt file was the beginning of the reconciliation process the Company began in order to prepare a response and was unintentionally submitted in our response. Row 7, columns A to K, should be deleted.

B. The reference to "contributions Scott" refers to the person in the Accounting Department who provided 10-K information that was used to confirm the accuracy of the contribution amounts in the spreadsheet.

C. The $1,800,000 was a preliminary variance that was resolved before the Company finalized the spreadsheet. It represents the amount of contributions made to a separate non-qualified plan (ESRIP – Executive Supplemental Retirement Income Plan) that was not relevant to this response. AON Hewitt used the correct contributions in their analysis.

D. Cell M113 represents the 2010 gain/loss amortization attributable only to contributions made in fiscal year 2010. The gain/loss amortization calculation is determined based on the amount of unrecognized gain/loss as of the start of the fiscal year, which is January 1, 2010 in this case. Fiscal year 2010 contributions do not impact the amount of unrecognized gain/loss as of January 1, 2010. Therefore, there is no 2010 gain/loss amortization attributable to contributions made in fiscal year 2010. This results in no amount in cell M133.

Cells M133 and M138 represent the 2010 and 2011 gain/loss amortizations attributable only to contributions made in fiscal year 2011, respectively. The gain/loss amortization calculation is determined based on the amount of unrecognized gain/loss as of the start of the fiscal year, which is January 1, 2010 and January 1, 2011 for fiscal years 2010 and 2011, respectively. Fiscal year 2011 contributions do not impact the amount of unrecognized gain/loss as of January 1, 2010 and January 1, 2011. Therefore, there is no 2010 or 2011 gain/loss amortization attributable to contributions made in fiscal years 2011. This results in no amount in cells M133 and M138

NW Natural

Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR 1-NWIGU-CUB-DR 186:

Provide separately by month for each of the years 2008 through 2011:

A. The Company's actual ROE including the WACOG gains/losses; and

B. The Company's actual ROE excluding the WACOG gains/losses.

Response: 9/26/2012

The Company objects to these requests on the basis that they request information not relevant to the Second Bench Request and would require the Company to develop information that does not currently exist and that would be unduly burdensome to develop. Please refer to NWN/1500, Anderson/5 for the annual ROEs including and excluding WACOG gains and losses.

ATTACHMENT - RESPONSE TO NWIGU-CUB DR 184

AON Hewitt

NW Natural
BU and NBU Plans

Pension Contributions Impact on FAS 87 Expense

	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Total FAS 87 expense	6,629,242	6,914,465	8,172,990	6,687,898	4,292,980	14,579,030	11,404,046	16,295,255	19,832,904	Not Available	Not Available
Total contributions	8,260,704	31,000,000	0	0	0	25,000,000	10,000,000	20,245,000	23,500,000	Not Available	Not Available
Expected return on assets (EROA)	8.25%	8.25%	8.25%	8.25%	8.25%	8.25%	8.25%	8.25%	8.00%	8.00%	8.00%
Actual return on assets	13.50%	7.10%	14.20%	8.30%	-27.20%	15.80%	13.20%	-2.40%	8.00%	Not Available	Not Available

Question 1
See response letter.

Question 2

2004 Contributions Only	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012	Fiscal 2013	Test Year 2012/2013
Impact on EROA	(182,293)	(705,725)	(755,831)	(863,159)	(934,801)	(680,535)	(788,060)	(892,084)	(844,290)	(911,833)	(900,576)
Impact on (gain)/loss amortization	0	(25,060)	(12,428)	(67,865)	(63,268)	384,829	314,265	219,606	349,170	315,116	320,792
Total impact on FAS 87 expense	(182,293)	(730,785)	(768,259)	(931,024)	(998,069)	(295,706)	(473,795)	(672,478)	(495,120)	(596,717)	(579,784)

2005 Contributions Only	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012	Fiscal 2013	Test Year 2012/2013
Impact on EROA	0	(475,001)	(2,591,355)	(2,959,328)	(3,204,952)	(2,333,205)	(2,701,851)	(3,058,496)	(2,894,634)	(3,126,205)	(3,087,610)
Impact on (gain)/loss amortization	0	0	5,994	(168,672)	(158,116)	1,206,273	979,209	710,538	1,111,226	1,021,315	1,036,300
Total impact on FAS 87 expense	0	(475,001)	(2,585,361)	(3,128,000)	(3,363,068)	(1,126,932)	(1,722,642)	(2,347,958)	(1,783,408)	(2,104,890)	(2,051,310)

2008 Contributions Only	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012	Fiscal 2013	Test Year 2012/2013
Impact on EROA	0	0	0	0	0	0	0	0	0	0	0
Impact on (gain)/loss amortization	0	0	0	0	0	0	0	0	0	0	0
Total impact on FAS 87 expense	0	0	0	0	0	0	0	0	0	0	0

2009 Contributions Only	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	0	0	0	0	0	(1,532,888)	(2,302,603)	(2,606,546)	(2,466,899)	(2,664,250)	(2,631,358)
Impact on (gain)/loss amortization	0	0	0	0	0	0	(150,995)	(293,125)	122,625	110,329	112,378
Total impact on FAS 87 expense	0	0	0	0	0	(1,532,888)	(2,453,598)	(2,899,671)	(2,344,274)	(2,553,921)	(2,518,980)

2010 Contributions Only	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	0	0	0	0	0	0	(684,852)	(915,059)	(866,034)	(935,316)	(923,769)
Impact on (gain)/loss amortization	0	0	0	0	0	0	0	(46,976)	97,952	87,421	89,176
Total impact on FAS 87 expense	0	0	0	0	0	0	(684,852)	(962,035)	(768,082)	(847,895)	(834,593)

2011 Contributions Only	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	0	0	0	0	0	0	0	(1,168,273)	(1,592,050)	(1,719,414)	(1,698,187)
Impact on (gain)/loss amortization	0	0	0	0	0	0	0	0	171,648	156,212	158,785
Total impact on FAS 87 expense	0	0	0	0	0	0	0	(1,168,273)	(1,420,402)	(1,563,202)	(1,539,402)

2012 Contributions Only	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	0	0	0	0	0	0	0	0	(1,315,799)	(1,985,264)	(1,873,687)
Impact on (gain)/loss amortization	0	0	0	0	0	0	0	0	0	0	0
Total impact on FAS 87 expense	0	0	0	0	0	0	0	0	(1,315,799)	(1,985,264)	(1,873,687)

Question 3

2008 - 2011 Contributions Combined	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	0	0	0	0	0	(1,532,888)	(2,987,455)	(4,689,878)	(4,924,983)	(5,318,980)	(5,253,314)
Impact on (gain)/loss amortization	0	0	0	0	0	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	0	0	0	0	0	(1,532,888)	(3,138,450)	(5,029,979)	(4,532,758)	(4,965,018)	(4,892,975)

2008 - 2012 Contributions Combined	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	0	0	0	0	0	(1,532,888)	(2,987,455)	(4,689,878)	(6,240,782)	(7,304,244)	(7,127,001)
Impact on (gain)/loss amortization	0	0	0	0	0	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	0	0	0	0	0	(1,532,888)	(3,138,450)	(5,029,979)	(5,848,557)	(6,950,282)	(6,766,662)

Question 4

2009 - 2011 Contributions Combined	Fiscal 2004	Fiscal 2005	Fiscal 2006	Fiscal 2007	Fiscal 2008	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013

ATTACHMENT - RESPONSE TO NWIGU-CUB DR 184

Impact on EROA	$ 0	$ 0	$ 0	$ 0	$ 0	$ (1,532,888)	$ (2,987,455)	$ (4,689,878)	$ (4,924,983)	$ (5,318,980)	$ (5,253,314)
Impact on (gain)/loss amortization	0	0	0	0	0	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ 0	$ 0	$ (1,532,888)	$ (3,138,450)	$ (5,029,979)	$ (4,532,758)	$ (4,965,018)	$ (4,892,975)

2009 - 2012 Contributions Combined	**Fiscal 2004**	**Fiscal 2005**	**Fiscal 2006**	**Fiscal 2007**	**Fiscal 2008**	**Fiscal 2009**	**Fiscal 2010**	**Fiscal 2011**	**Fiscal 2012[1]**	**Fiscal 2013[2]**	**Test Year 2012/2013**
Impact on EROA	$ 0	$ 0	$ 0	$ 0	$ 0	$ (1,532,888)	$ (2,987,455)	$ (4,689,878)	$ (6,240,782)	$ (7,304,244)	$ (7,127,001)
Impact on (gain)/loss amortization	0	0	0	0	0	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ 0	$ 0	$ (1,532,888)	$ (3,138,450)	$ (5,029,979)	$ (5,848,557)	$ (6,950,282)	$ (6,766,662)

[1]Estimated based on actual contributions through September 30, 2012, beginning of year gain/(loss) and asset values from fiscal year end 2011 disclosures, and estimated average remaining service of 9.67 years (BU) and 7.94 years (NBU).

[2]Estimated based on 8% actual return for 2012, 8% expected return in 2013, and estimated average remaining service of 9.17 years (BU) and 7.69 years (NBU).

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Pension Contributions Impact on FAS 87 Expense

	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Total FAS 87 expense	$ 14,579,030	$ 11,404,046	$ 16,295,255	$ 19,832,904	$ Not Available	$ Not Available
Total contributions	25,000,000	10,000,000	20,245,000	23,500,000	Not Available	Not Available
Expected return on assets (EROA)	8.25%	8.25%	8.25%	8.00%	8.00%	8.00%
Actual return on assets	15.80%	13.20%	-2.40%	8.00%	Not Available	Not Available

Question 1

See response letter.

Question 2

2008 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012	Fiscal 2013	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Impact on (gain)/loss amortization	0	0	0	0	0	0
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

2009 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,302,603)	$ (2,606,546)	$ (2,466,899)	$ (2,664,250)	$ (2,631,358)
Impact on (gain)/loss amortization	0	(150,995)	(293,125)	122,625	110,329	112,378
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,453,598)	$ (2,899,671)	$ (2,344,274)	$ (2,553,921)	$ (2,518,980)

2010 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ (684,852)	$ (915,059)	$ (866,034)	$ (935,316)	$ (923,769)
Impact on (gain)/loss amortization	0	0	(46,976)	97,952	87,421	89,176
Total impact on FAS 87 expense	$ 0	$ (684,852)	$ (962,035)	$ (768,082)	$ (847,895)	$ (834,593)

2011 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ (1,168,273)	$ (1,592,050)	$ (1,719,414)	$ (1,698,187)

	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on (gain)/loss amortization	0	0	0	171,648	156,212	158,785
Total impact on FAS 87 expense	$ 0	$ 0	$ (1,168,273)	$ (1,420,402)	$ (1,563,202)	$ (1,539,402)

2012 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ (1,315,799)	$ (1,985,264)	$ (1,873,687)
Impact on (gain)/loss amortization	0	0	0	0	0	0
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ (1,315,799)	$ (1,985,264)	$ (1,873,687)

Question 3

2008 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,689,878)	$ (4,924,983)	$ (5,318,980)	$ (5,253,314)
Impact on (gain)/loss amortization	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,029,979)	$ (4,532,758)	$ (4,965,018)	$ (4,892,975)

2008 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,689,878)	$ (6,240,782)	$ (7,304,244)	$ (7,127,001)
Impact on (gain)/loss amortization	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,029,979)	$ (5,848,557)	$ (6,950,282)	$ (6,766,662)

Question 4

2009 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,689,878)	$ (4,924,983)	$ (5,318,980)	$ (5,253,314)
Impact on (gain)/loss amortization	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,029,979)	$ (4,532,758)	$ (4,965,018)	$ (4,892,975)

2009 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,689,878)	$ (6,240,782)	$ (7,304,244)	$ (7,127,001)
Impact on (gain)/loss amortization	0	(150,995)	(340,101)	392,225	353,962	360,339
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,029,979)	$ (5,848,557)	$ (6,950,282)	$ (6,766,662)

[1]Estimated based on actual contributions through September 30, 2012, beginning of year gain/(loss) and asset values from fiscal year end 2011 disclosures, and estimated average remaining service of 9.67 years (BU) and 7.94 years (NBU).
[2]Estimated based on 8% actual return for 2012, 8% expected return in 2013, and estimated average remaining service of 9.17 years (BU) and 7.69 years (NBU).

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Pension Contributions Impact on FAS 87 Expense

	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Total FAS 87 expense	$ 14,579,030	$ 11,404,046	$ 16,295,255	$ 19,832,904	$ Not Available	$ Not Available
Total contributions	25,000,000	10,000,000	20,245,000	23,500,000	Not Available	Not Available
Expected return on assets (EROA)	8.25%	8.25%	8.25%	8.00%	8.00%	8.00%
Actual return on assets[3]	15.80%	13.20%	-2.40%	8.00%	Not Available	Not Available
Highest rate of return in all years shown	15.80%	15.80%	15.80%	15.80%	Not Available	Not Available

Question 2

2008 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012	Fiscal 2013	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Impact on (gain)/loss amortization	0	0	0	0	0	0
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

2009 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,302,603)	$ (2,666,414)	$ (2,994,140)	$ (3,467,215)	$ (3,388,369)
Impact on (gain)/loss amortization	0	(150,995)	(374,744)	(627,310)	(912,132)	(864,662)
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,453,598)	$ (3,041,158)	$ (3,621,450)	$ (4,379,347)	$ (4,253,031)

2010 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ (684,852)	$ (932,588)	$ (1,047,212)	$ (1,212,671)	$ (1,185,095)
Impact on (gain)/loss amortization	0	0	(71,515)	(166,932)	(272,454)	(254,867)
Total impact on FAS 87 expense	$ 0	$ (684,852)	$ (1,004,103)	$ (1,214,144)	$ (1,485,125)	$ (1,439,962)

2011 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ (1,168,273)	$ (1,797,030)	$ (2,080,961)	$ (2,033,639)
Impact on (gain)/loss amortization	0	0	0	(119,102)	(312,951)	(280,643)
Total impact on FAS 87 expense	$ 0	$ 0	$ (1,168,273)	$ (1,916,132)	$ (2,393,912)	$ (2,314,282)

2012 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ (1,315,799)	$ (2,085,982)	$ (1,957,618)
Impact on (gain)/loss amortization	0	0	0	0	(145,677)	(121,398)
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ (1,315,799)	$ (2,231,659)	$ (2,079,016)

Question 3

2008 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,767,275)	$ (5,838,382)	$ (6,760,847)	$ (6,607,103)
Impact on (gain)/loss amortization	0	(150,995)	(446,259)	(913,344)	(1,497,537)	(1,400,172)
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,213,534)	$ (6,751,726)	$ (8,258,384)	$ (8,007,275)

2008 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,767,275)	$ (7,154,181)	$ (8,846,829)	$ (8,564,721)
Impact on (gain)/loss amortization	0	(150,995)	(446,259)	(913,344)	(1,643,214)	(1,521,570)
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,213,534)	$ (8,067,525)	$ (10,490,043)	$ (10,086,291)

Question 4

2009 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,767,275)	$ (5,838,382)	$ (6,760,847)	$ (6,607,103)
Impact on (gain)/loss amortization	0	(150,995)	(446,259)	(913,344)	(1,497,537)	(1,400,172)
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,213,534)	$ (6,751,726)	$ (8,258,384)	$ (8,007,275)

2009 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,987,455)	$ (4,767,275)	$ (7,154,181)	$ (8,846,829)	$ (8,564,721)
Impact on (gain)/loss amortization	0	(150,995)	(446,259)	(913,344)	(1,643,214)	(1,521,570)
Total impact on FAS 87 expense	$ (1,532,888)	$ (3,138,450)	$ (5,213,534)	$ (8,067,525)	$ (10,490,043)	$ (10,086,291)

[1]Estimated based on actual contributions through September 30, 2012, beginning of year gain/(loss) and asset values from fiscal year end 2011 disclosures, and estimated average remaining service of 9.67 years (BU) and 7.94 years (NBU).
[2]Estimated based on 15.80% actual return for 2012, 8% expected return in 2013, and estimated average remaining service of 9.17 years (BU) and 7.69 years (NB

Pension Contributions Impact on FAS 87 Expense

	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Total FAS 87 expense	$ 14,579,030	$ 11,404,046	$ 16,295,255	$ 19,832,904	$ Not Available	$ Not Available
Total contributions	25,000,000	10,000,000	20,245,000	23,500,000	Not Available	Not Available
Expected return on assets (EROA)	8.25%	8.25%	8.25%	8.00%	8.00%	8.00%
Actual return on assets[3]	15.80%	13.20%	-2.40%	8.00%	Not Available	Not Available
Median rate of return in all years shown	10.60%	10.60%	10.60%	10.60%	Not Available	Not Available

Question 2

2008 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012	Fiscal 2013	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Impact on (gain)/loss amortization	0	0	0	0	0	0
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

2009 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,224,540)	$ (2,460,342)	$ (2,638,679)	$ (2,918,379)	$ (2,871,762)
Impact on (gain)/loss amortization	0	(47,272)	(114,391)	(186,365)	(269,832)	(255,921)
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,271,812)	$ (2,574,733)	$ (2,825,044)	$ (3,188,211)	$ (3,127,683)

2010 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ (684,852)	$ (897,463)	$ (962,515)	$ (1,064,542)	$ (1,047,538)
Impact on (gain)/loss amortization	0	0	(22,345)	(50,844)	(83,206)	(77,812)
Total impact on FAS 87 expense	$ 0	$ (684,852)	$ (919,808)	$ (1,013,359)	$ (1,147,748)	$ (1,125,350)

2011 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ (1,168,273)	$ (1,739,351)	$ (1,923,722)	$ (1,892,994)
Impact on (gain)/loss amortization	0	0	0	(37,289)	(99,936)	(89,495)
Total impact on FAS 87 expense	$ 0	$ 0	$ (1,168,273)	$ (1,776,640)	$ (2,023,658)	$ (1,982,489)

2012 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ (1,315,799)	$ (2,019,038)	$ (1,901,832)
Impact on (gain)/loss amortization	0	0	0	0	(48,850)	(40,708)
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ (1,315,799)	$ (2,067,888)	$ (1,942,540)

Question 3

2008 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,909,392)	$ (4,526,078)	$ (5,340,545)	$ (5,906,643)	$ (5,812,294)
Impact on (gain)/loss amortization	0	(47,272)	(136,736)	(274,498)	(452,974)	(423,228)
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,956,664)	$ (4,662,814)	$ (5,615,043)	$ (6,359,617)	$ (6,235,522)

2008 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,909,392)	$ (4,526,078)	$ (6,656,344)	$ (7,925,681)	$ (7,714,126)
Impact on (gain)/loss amortization	0	(47,272)	(136,736)	(274,498)	(501,824)	(463,936)
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,956,664)	$ (4,662,814)	$ (6,930,842)	$ (8,427,505)	$ (8,178,062)

Question 4

2009 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,909,392)	$ (4,526,078)	$ (5,340,545)	$ (5,906,643)	$ (5,812,294)
Impact on (gain)/loss amortization	0	(47,272)	(136,736)	(274,498)	(452,974)	(423,228)
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,956,664)	$ (4,662,814)	$ (5,615,043)	$ (6,359,617)	$ (6,235,522)

2009 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,909,392)	$ (4,526,078)	$ (6,656,344)	$ (7,925,681)	$ (7,714,126)
Impact on (gain)/loss amortization	0	(47,272)	(136,736)	(274,498)	(501,824)	(463,936)
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,956,664)	$ (4,662,814)	$ (6,930,842)	$ (8,427,505)	$ (8,178,062)

[1]Estimated based on actual contributions through September 30, 2012, beginning of year gain/(loss) and asset values from fiscal year end 2011 disclosures, and estimated average remaining service of 9.67 years (BU) and 7.94 years (NBU).
[2]Estimated based on 10.60% actual return for 2012, 8% expected return in 2013, and estimated average remaining service of 9.17 years (BU) and 7.69 years (NBU

Pension Contributions Impact on FAS 87 Expense

	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Total FAS 87 expense	$ 14,579,030	$ 11,404,046	$ 16,295,255	$ 19,832,904	$ Not Available	$ Not Available
Total contributions	25,000,000	10,000,000	20,245,000	23,500,000	Not Available	Not Available
Expected return on assets (EROA)	8.25%	8.25%	8.25%	8.00%	8.00%	8.00%
Actual return on assets[3]	15.80%	13.20%	-2.40%	8.00%	Not Available	Not Available
Lowest rate of return in all years shown	-2.40%	-2.40%	-2.40%	-2.40%	Not Available	Not Available

Question 2

2008 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012	Fiscal 2013	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0
Impact on (gain)/loss amortization	0	0	0	0	0	0
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ 0	$ 0	$ 0

2009 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,025,229)	$ (1,976,623)	$ (1,870,724)	$ (1,825,827)	$ (1,833,310)
Impact on (gain)/loss amortization	0	217,557	492,503	748,224	963,326	927,476
Total impact on FAS 87 expense	$ (1,532,888)	$ (1,807,672)	$ (1,484,120)	$ (1,122,500)	$ (862,501)	$ (905,834)

2010 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ (684,852)	$ (808,422)	$ (765,110)	$ (746,747)	$ (749,808)
Impact on (gain)/loss amortization	0	0	102,299	217,664	314,560	298,411
Total impact on FAS 87 expense	$ 0	$ (684,852)	$ (706,123)	$ (547,446)	$ (432,187)	$ (451,397)

2011 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ (1,168,273)	$ (1,592,050)	$ (1,553,840)	$ (1,560,208)
Impact on (gain)/loss amortization	0	0	0	171,648	397,888	360,181
Total impact on FAS 87 expense	$ 0	$ 0	$ (1,168,273)	$ (1,420,402)	$ (1,155,952)	$ (1,200,027)

2012 Contributions Only	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ 0	$ 0	$ 0	$ (1,315,799)	$ (1,848,002)	$ (1,759,302)
Impact on (gain)/loss amortization	0	0	0	0	198,540	165,450
Total impact on FAS 87 expense	$ 0	$ 0	$ 0	$ (1,315,799)	$ (1,649,462)	$ (1,593,852)

Question 3

2008 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,710,081)	$ (3,953,318)	$ (4,227,884)	$ (4,126,414)	$ (4,143,326)
Impact on (gain)/loss amortization	0	217,557	594,802	1,137,536	1,675,774	1,586,068
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,492,524)	$ (3,358,516)	$ (3,090,348)	$ (2,450,640)	$ (2,557,258)

2008 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,710,081)	$ (3,953,318)	$ (5,543,683)	$ (5,974,416)	$ (5,902,628)
Impact on (gain)/loss amortization	0	217,557	594,802	1,137,536	1,874,314	1,751,518
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,492,524)	$ (3,358,516)	$ (4,406,147)	$ (4,100,102)	$ (4,151,110)

Question 4

2009 - 2011 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,710,081)	$ (3,953,318)	$ (4,227,884)	$ (4,126,414)	$ (4,143,326)
Impact on (gain)/loss amortization	0	217,557	594,802	1,137,536	1,675,774	1,586,068
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,492,524)	$ (3,358,516)	$ (3,090,348)	$ (2,450,640)	$ (2,557,258)

2009 - 2012 Contributions Combined	Fiscal 2009	Fiscal 2010	Fiscal 2011	Fiscal 2012[1]	Fiscal 2013[2]	Test Year 2012/2013
Impact on EROA	$ (1,532,888)	$ (2,710,081)	$ (3,953,318)	$ (5,543,683)	$ (5,974,416)	$ (5,902,628)
Impact on (gain)/loss amortization	0	217,557	594,802	1,137,536	1,874,314	1,751,518
Total impact on FAS 87 expense	$ (1,532,888)	$ (2,492,524)	$ (3,358,516)	$ (4,406,147)	$ (4,100,102)	$ (4,151,110)

[1] Estimated based on actual contributions through September 30, 2012, beginning of year gain/(loss) and asset values from fiscal year end 2011 disclosures, and estimated average remaining service of 9.67 years (BU) and 7.94 years (NBU).
[2] Estimated based on -2.40% actual return for 2012, 8% expected return in 2013, and estimated average remaining service of 9.17 years (BU) and 7.69 years (NBU)

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing ***NWIGU'S AND CUB'S JOINT SUPPLEMENTAL POST-HEARING BRIEF*** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

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Dated in Portland, Oregon, this 5th day of October 2012.

/s/ Tommy A. Brooks
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Of Attorneys for the
Northwest Industrial Gas Users