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January 9, 2012

NWN Advice No. OPUC 11-19
Supplement B

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: UG 221 – Supplemental Filing
Application of NW Natural for a General Rate Revision

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), files herewith pages that were inadvertently omitted from Advice No. OPUC 11-19 filed on December 30, 2011. The following pages are attached:

Exhibit 504 – Hadaway/1-5
Exhibit 505 – Hadaway 1-3
Exhibit 901 – Williams/1-2
Exhibit 905 – Williams/1-4
Exhibit 1502 – Miller/1-7
Exhibit 1503 – Miller/1-4

Please call me if you have questions.

Sincerely,

NW NATURAL

/s/ Onita King

Onita R. King
Tariffs and Regulatory Compliance

enclosures



CERTIFICATE OF SERVICE

I hereby certify that I served SUPPLEMENTAL FILING - NWN ADVICE No. OPUC 11-19B, upon the following parties by electronic mail.

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DATED at Portland, Oregon, this 9th day of January 2012

 /s/ Kelley C. Miller
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**Northwest Natural Gas Co.
Discounted Cash Flow Analysis
Summary Of DCF Model Results**

Company	Constant Growth DCF Model Analysts' Growth Rates	Constant Growth DCF Model Long-Term GDP Growth	Low Near-Term Growth Two-Stage Growth DCF Model
1 Alliant Energy Co.	11.2%	10.5%	10.5%
2 Black Hills Corp	11.1%	10.7%	10.2%
3 Con. Edison	7.6%	10.1%	9.6%
4 DTE Energy Co.	9.2%	10.7%	10.5%
5 N.W. Nat'l Gas	8.2%	9.9%	9.5%
6 NiSource Inc.	14.1%	10.2%	9.5%
7 Piedmont Nat'l	8.3%	9.8%	9.5%
8 Pepco Holdings	10.6%	11.6%	11.1%
9 SCANA Corp.	8.9%	10.8%	10.3%
10 Sempra Energy	9.9%	9.9%	9.9%
11 Southwest Gas	8.8%	8.8%	8.7%
12 Vectren Corp.	10.6%	11.1%	10.9%
13 Wisconsin Energy	11.5%	9.5%	10.3%
14 Xcel Energy Inc.	9.4%	10.2%	9.8%
GROUP AVERAGE	10.0%	10.3%	10.0%
GROUP MEDIAN	9.6%	10.2%	10.1%

Sources: Value Line Investment Survey, Electric Utility (East), Aug 26, 2011; (Central), Sep 23, 2011; (West), Nov 4, 2011; Natural Gas Utility, Sep 9, 2011.

NOTE: SEE PAGE 5 OF THIS EXHIBIT FOR FURTHER EXPLANATION OF EACH COLUMN.

**Northwest Natural Gas Co.
Constant Growth DCF Model
Analysts' Growth Rates**

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Company	Recent Price(P0)	Next Year's Div(D1)	Dividend Yield	Analysts' Estimated Growth				ROE K=Div Yld+G (Cols 3+7)
				Value Line	Zacks	Thomson	Average Growth (Cols 4-6)	
1 Alliant Energy Co.	38.02	1.80	4.73%	7.00%	6.00%	6.50%	6.50%	11.2%
2 Black Hills Corp	30.28	1.48	4.89%	8.50%	5.00%	5.00%	6.17%	11.1%
3 Con. Edison	55.70	2.42	4.35%	3.00%	3.30%	3.47%	3.26%	7.6%
4 DTE Energy Co.	48.95	2.42	4.94%	4.50%	5.00%	3.41%	4.30%	9.2%
5 N.W. Nat'l Gas	43.74	1.78	4.07%	4.50%	4.40%	3.63%	4.18%	8.2%
6 NiSource Inc.	20.99	0.92	4.38%	9.00%	NA	10.50%	9.75%	14.1%
7 Piedmont Nat'l	29.54	1.19	4.03%	3.00%	4.50%	5.20%	4.23%	8.3%
8 Pepco Holdings	18.65	1.08	5.79%	2.50%	4.30%	7.50%	4.77%	10.6%
9 SCANA Corp.	39.33	1.98	5.03%	3.00%	4.20%	4.53%	3.91%	8.9%
10 Sempra Energy	50.72	2.08	4.10%	3.50%	7.00%	6.77%	5.76%	9.9%
11 Southwest Gas	36.19	1.10	3.04%	9.00%	6.00%	2.20%	5.73%	8.8%
12 Vectren Corp.	26.72	1.41	5.28%	5.50%	5.00%	5.57%	5.36%	10.6%
13 Wisconsin Energy	30.80	1.14	3.70%	8.50%	7.50%	7.33%	7.78%	11.5%
14 Xcel Energy Inc.	24.15	1.06	4.39%	5.00%	4.90%	5.05%	4.98%	9.4%
GROUP AVERAGE	35.27	1.56	4.48%	5.46%	5.16%	5.48%	5.48%	10.0%
GROUP MEDIAN			4.39%					9.6%

Sources: Value Line Investment Survey, Electric Utility (East), Aug 26, 2011; (Central), Sep 23, 2011; (West), Nov 4, 2011; Natural Gas Utility, Sep 9, 2011.

NOTE: SEE PAGE 5 OF THIS EXHIBIT FOR FURTHER EXPLANATION OF EACH COLUMN.

NWN/504
Hadaway/2

**Northwet Natural Gas Co.
Constant Growth DCF Model
Long-Term GDP Growth**

	(9)	(10)	(11)	(12)	(13)
Company	Next				ROE
	Recent Price(P0)	Year's Div(D1)	Dividend Yield	GDP Growth	K=Div Yld+G (Cols 11+12)
1 Alliant Energy Co.	38.02	1.80	4.73%	5.80%	10.5%
2 Black Hills Corp	30.28	1.48	4.89%	5.80%	10.7%
3 Con. Edison	55.70	2.42	4.35%	5.80%	10.1%
4 DTE Energy Co.	48.95	2.42	4.94%	5.80%	10.7%
5 N.W. Nat'l Gas	43.74	1.78	4.07%	5.80%	9.9%
6 NiSource Inc.	20.99	0.92	4.38%	5.80%	10.2%
7 Piedmont Nat'l	29.54	1.19	4.03%	5.80%	9.8%
8 Pepco Holdings	18.65	1.08	5.79%	5.80%	11.6%
9 SCANA Corp.	39.33	1.98	5.03%	5.80%	10.8%
10 Sempra Energy	50.72	2.08	4.10%	5.80%	9.9%
11 Southwest Gas	36.19	1.10	3.04%	5.80%	8.8%
12 Vectren Corp.	26.72	1.41	5.28%	5.80%	11.1%
13 Wisconsin Energy	30.80	1.14	3.70%	5.80%	9.5%
14 Xcel Energy Inc.	24.15	1.06	4.39%	5.80%	10.2%
GROUP AVERAGE	35.27	1.56	4.48%	5.80%	10.3%
GROUP MEDIAN			4.39%		10.2%

Sources: Value Line Investment Survey, Electric Utility (East), Aug 26, 2011; (Central), Sep 23, 2011; (West), Nov 4, 2011; Natural Gas Utility, Sep 9, 2011.

NOTE: SEE PAGE 5 OF THIS EXHIBIT FOR FURTHER EXPLANATION OF EACH COLUMN.

NMN/504
Hadaway/3

**Northwest Natural Gas Co.
Low Near-Term Growth
Two-Stage Growth DCF Model**

	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
Company	2012 Div	2015 Div	Annual Change to 2015	CASH FLOWS							ROE=Internal Rate of Return (Yrs 0-150)
				Recent Price	Year 1 Div	Year 2 Div	Year 3 Div	Year 4 Div	Year 5 Div	Year 5-150 Div Growth	
1 Alliant Energy Co.	1.80	2.10	0.10	-38.02	1.80	1.90	2.00	2.10	2.22	5.80%	10.5%
2 Black Hills Corp	1.48	1.55	0.02	-30.28	1.48	1.50	1.53	1.55	1.64	5.80%	10.2%
3 Con. Edison	2.42	2.48	0.02	-55.70	2.42	2.44	2.46	2.48	2.62	5.80%	9.6%
4 DTE Energy Co.	2.42	2.70	0.09	-48.95	2.42	2.51	2.61	2.70	2.86	5.80%	10.5%
5 N.W. Nat'l Gas	1.78	1.90	0.04	-43.74	1.78	1.82	1.86	1.90	2.01	5.80%	9.5%
6 NiSource Inc.	0.92	0.92	0.00	-20.99	0.92	0.92	0.92	0.92	0.97	5.80%	9.5%
7 Piedmont Nat'l	1.19	1.31	0.04	-29.54	1.19	1.23	1.27	1.31	1.39	5.80%	9.5%
8 Pepco Holdings	1.08	1.16	0.03	-18.65	1.08	1.11	1.13	1.16	1.23	5.80%	11.1%
9 SCANA Corp.	1.98	2.10	0.04	-39.33	1.98	2.02	2.06	2.10	2.22	5.80%	10.3%
10 Sempra Energy	2.08	2.50	0.14	-50.72	2.08	2.22	2.36	2.50	2.65	5.80%	9.9%
11 Southwest Gas	1.10	1.25	0.05	-36.19	1.10	1.15	1.20	1.25	1.32	5.80%	8.7%
12 Vectren Corp.	1.41	1.60	0.06	-26.72	1.41	1.47	1.54	1.60	1.69	5.80%	10.9%
13 Wisconsin Energy	1.14	1.65	0.17	-30.80	1.14	1.31	1.48	1.65	1.75	5.80%	10.3%
14 Xcel Energy Inc.	1.06	1.15	0.03	-24.15	1.06	1.09	1.12	1.15	1.22	5.80%	9.8%
GROUP AVERAGE											10.0%
GROUP MEDIAN											10.1%

Sources: Value Line Investment Survey, Electric Utility (East), Aug 26, 2011; (Central), Sep 23, 2011; (West), Nov 4, 2011; Natural Gas Utility, Sep 9, 2011.

NOTE: SEE PAGE 5 OF THIS EXHIBIT FOR FURTHER EXPLANATION OF EACH COLUMN.

NWN/504
Hadaway/4

**Northwest Natural Gas Co.
Discounted Cash Flow Analysis
Column Descriptions**

- | | |
|--|---|
| Column 1: Three-month Average Price per Share (August 2011-October 2011 | Column 13: Column 11 Plus Column 12 |
| Column 2: Estimated 2012 Div per Share from Value Line | Column 14: Estimated 2012 Div per Share from Value Line |
| Column 3: Column 2 Divided by Column 1 | Column 15: Estimated 2015 Div per Share from Value Line |
| Column 4: "Est'd '08-'10 to '14-'16" Earnings Growth Reported by Value Line | Column 16: (Column 15 Minus Column 14) Divided by Three |
| Column 5: "Next 5 Years" Company Growth Estimate as Reported by Zacks.com | Column 17: See Column 1 |
| Column 6: "Next 5 Years (per annum) Growth Estimate Reported by Thomson Financial Network (at Yahoo Finance) | Column 18: See Column 14 |
| Column 7: Average of Columns 4-6 | Column 19: Column 18 Plus Column 16 |
| Column 8: Column 3 Plus Column 7 | Column 20: Column 19 Plus Column 16 |
| Column 9: See Column 1 | Column 21: Column 20 Plus Column 16 |
| Column 10: See Column 2 | Column 22: Column 21 Increased by the Growth Rate Shown in Column 23 |
| Column 11: Column 10 Divided by Column 9 | Column 23: See Column 12 |
| Column 12: Average of GDP Growth During the Last 10 year, 20 year, 30 year, 40 year, 50 year, and 60 year growth periods. See Schedule SCH-3 | Column 24: The Internal Rate of Return of the Cash Flows in Columns 17-22 along with the Dividends for the Years 6-150 Implied by the Growth Rates shown in Column 23 |

Northwest Natural Gas Co.

Risk Premium Analysis

(Based on Projected Interest Rates)

	MOODY'S AVERAGE PUBLIC UTILITY BOND YIELD (1)	AUTHORIZED GAS COMPANY RETURNS (2)	INDICATED RISK PREMIUM
1980	13.15%	14.05%	0.90%
1981	15.62%	15.11%	-0.51%
1982	15.33%	15.62%	0.29%
1983	13.31%	15.25%	1.94%
1984	14.03%	15.31%	1.28%
1985	12.29%	14.75%	2.46%
1986	9.46%	13.46%	4.00%
1987	9.98%	12.74%	2.76%
1988	10.45%	12.85%	2.40%
1989	9.66%	12.88%	3.22%
1990	9.76%	12.67%	2.91%
1991	9.21%	12.46%	3.25%
1992	8.57%	12.01%	3.44%
1993	7.56%	11.35%	3.79%
1994	8.30%	11.35%	3.05%
1995	7.91%	11.43%	3.52%
1996	7.74%	11.19%	3.45%
1997	7.63%	11.29%	3.66%
1998	7.00%	11.51%	4.51%
1999	7.55%	10.66%	3.11%
2000	8.14%	11.39%	3.25%
2001	7.72%	10.95%	3.23%
2002	7.53%	11.03%	3.50%
2003	6.61%	10.99%	4.38%
2004	6.20%	10.59%	4.39%
2005	5.67%	10.46%	4.79%
2006	6.08%	10.43%	4.35%
2007	6.11%	10.24%	4.13%
2008	6.65%	10.37%	3.72%
2009	6.28%	10.19%	3.91%
2010	5.55%	10.08%	4.53%
AVERAGE	8.94%	12.09%	3.15%

INDICATED COST OF EQUITY

PROJECTED SINGLE-A UTILITY BOND YIELD*	4.54%
MOODY'S AVG ANNUAL YIELD DURING STUDY	8.94%
INTEREST RATE DIFFERENCE	-4.40%
INTEREST RATE CHANGE COEFFICIENT	-41.71%
ADJUSTMENT TO AVG RISK PREMIUM	1.83%
BASIC RISK PREMIUM	3.15%
INTEREST RATE ADJUSTMENT	1.83%
EQUITY RISK PREMIUM	4.98%
PROJECTED SINGLE-A UTILITY BOND YIELD*	4.54%
INDICATED EQUITY RETURN	9.52%

(1) Moody's Investors Service

(2) Regulatory Focus, Regulatory Research Associates, Inc.

*Projected single-A bond yield is 124 basis points over projected long-term Treasury bond rate of 3.3% from Schedule SCH-2, p. 3. The single-A spread is for 3 months ended October 2011 from Schedule SCH-2, p. 2.

Northwest Natural Gas Co.

Risk Premium Analysis

(Based on Current Interest Rates)

	MOODY'S AVERAGE PUBLIC UTILITY BOND YIELD (1)	AUTHORIZED GAS COMPANY RETURNS (2)	INDICATED RISK PREMIUM
1980	13.15%	14.05%	0.90%
1981	15.62%	15.11%	-0.51%
1982	15.33%	15.62%	0.29%
1983	13.31%	15.25%	1.94%
1984	14.03%	15.31%	1.28%
1985	12.29%	14.75%	2.46%
1986	9.46%	13.46%	4.00%
1987	9.98%	12.74%	2.76%
1988	10.45%	12.85%	2.40%
1989	9.66%	12.88%	3.22%
1990	9.76%	12.67%	2.91%
1991	9.21%	12.46%	3.25%
1992	8.57%	12.01%	3.44%
1993	7.56%	11.35%	3.79%
1994	8.30%	11.35%	3.05%
1995	7.91%	11.43%	3.52%
1996	7.74%	11.19%	3.45%
1997	7.63%	11.29%	3.66%
1998	7.00%	11.51%	4.51%
1999	7.55%	10.66%	3.11%
2000	8.14%	11.39%	3.25%
2001	7.72%	10.95%	3.23%
2002	7.53%	11.03%	3.50%
2003	6.61%	10.99%	4.38%
2004	6.20%	10.59%	4.39%
2005	5.67%	10.46%	4.79%
2006	6.08%	10.43%	4.35%
2007	6.11%	10.24%	4.13%
2008	6.65%	10.37%	3.72%
2009	6.28%	10.19%	3.91%
2010	5.55%	10.08%	4.53%
AVERAGE	8.94%	12.09%	3.15%

INDICATED COST OF EQUITY

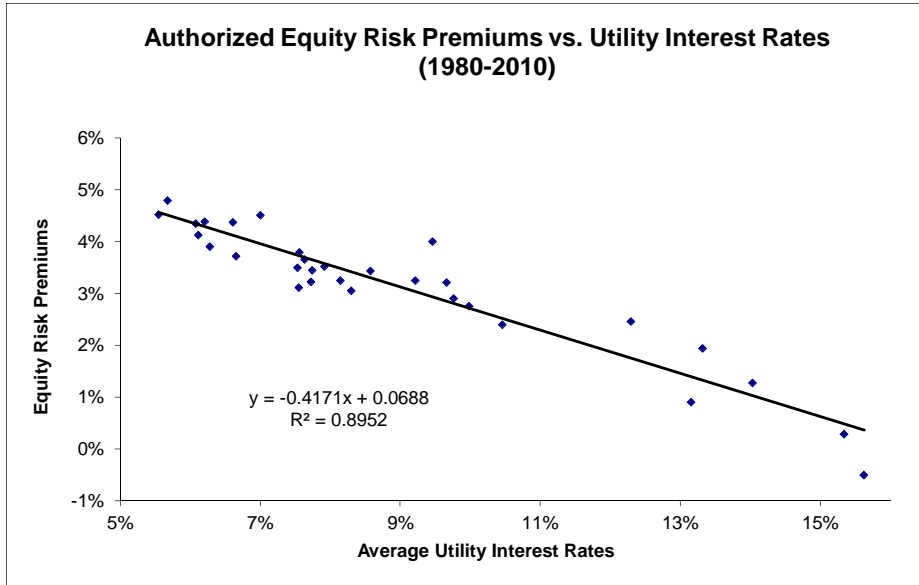
CURRENT SINGLE-A UTILITY BOND YIELD*	4.56%
MOODY'S AVG ANNUAL YIELD DURING STUDY	8.94%
INTEREST RATE DIFFERENCE	-4.38%
INTEREST RATE CHANGE COEFFICIENT	-41.71%
ADJUSTMENT TO AVG RISK PREMIUM	1.83%
BASIC RISK PREMIUM	3.15%
INTEREST RATE ADJUSTMENT	1.83%
EQUITY RISK PREMIUM	4.97%
CURRENT SINGLE-A UTILITY BOND YIELD*	4.56%
INDICATED EQUITY RETURN	9.53%

(1) Moody's Investors Service

(2) Regulatory Focus, Regulatory Research Associates, Inc.

*Current single-A utility bond yield is three month average of Moody's Single-A Public Utility Bond Yield Average through October 2011 from Schedule SCH-2, p. 2.

Northwest Natrual Gas Co.
Risk Premium Analysis
Regression Analysis & Interest Rate Change Coefficient



SUMMARY OUTPUT

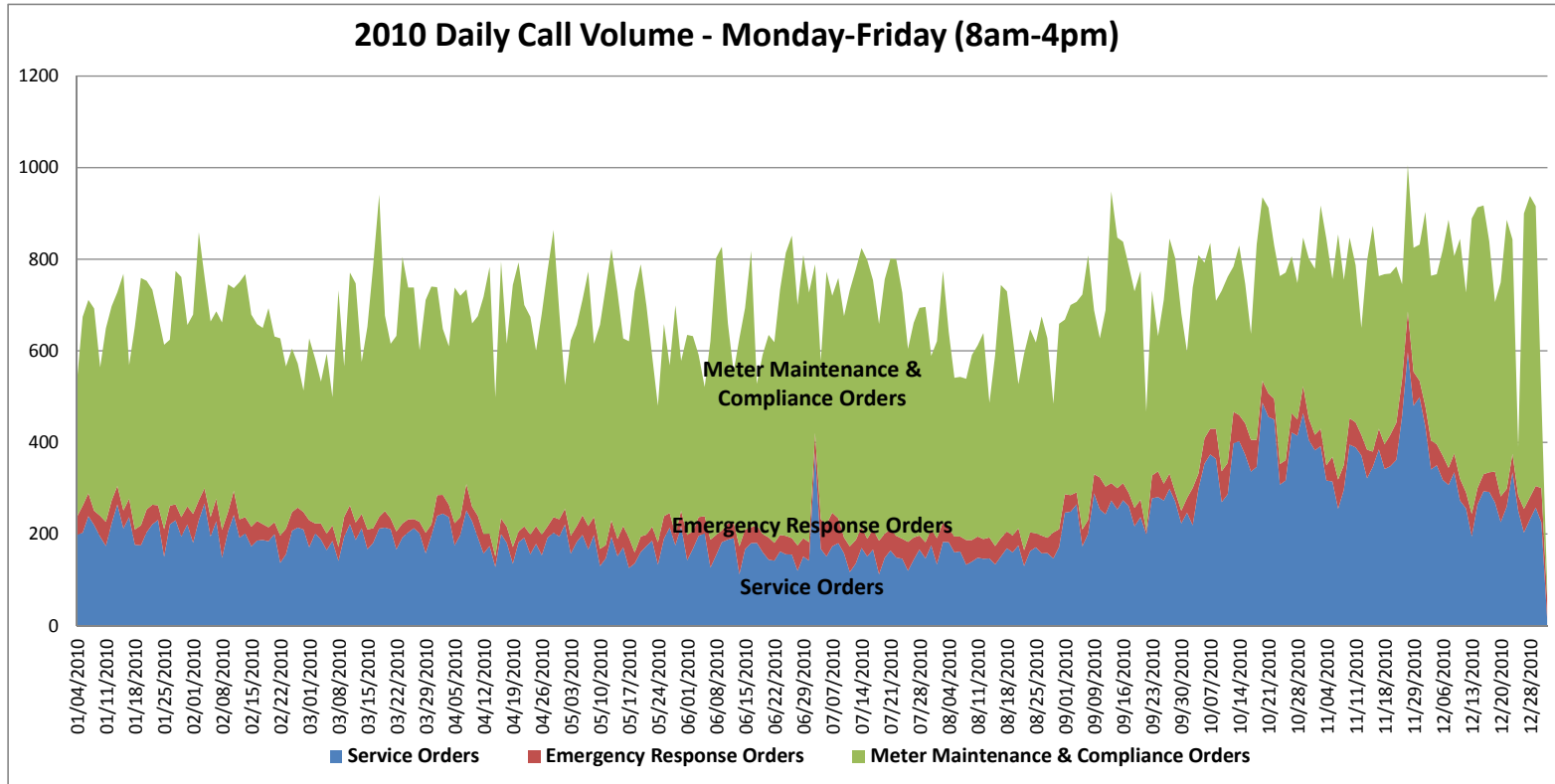
<i>Regression Statistics</i>	
Multiple R	0.946125577
R Square	0.895153607
Adjusted R Square	0.891538214
Standard Error	0.004144593
Observations	31

ANOVA

	<i>df</i>	<i>SS</i>	<i>MS</i>	<i>F</i>	<i>Significance F</i>
Regression	1	0.004253103	0.004253103	247.5951145	9.71512E-16
Residual	29	0.000498152	1.71777E-05		
Total	30	0.004751255			

	<i>Coefficients</i>	<i>Standard Error</i>	<i>t Stat</i>	<i>P-value</i>	<i>Lower 95%</i>	<i>Upper 95%</i>	<i>Lower 95.0%</i>	<i>Upper 95.0%</i>
Intercept	0.06876819	0.002483473	27.69033381	2.07972E-22	0.063688918	0.073847462	0.063688918	0.073847462
X Variable 1	-0.417149936	0.026510697	-15.73515537	9.71512E-16	-0.471370399	-0.362929474	-0.471370399	-0.362929474

NW NATURAL
Oregon General Rate Case - December 2011



NWN/901
Williams/1

NW Natural

Oregon General Rate Case - December 2011

Appointment type calls completed by Service Techs

Work Category	Call Volumes
Account Services	37,559
High Bill	1,004
Turn On	36,555
Credit & Collection	16,500
Credit Turn On	16,500
Servicing	18,550
Routine Inspection	5,045
Service Work	13,505
Grand Total	72,609
Average Per Day	199
<i>* Emergency and same day scheduling not subject to appointment</i>	

NW Natural
Oregon General Rate Case - December 2011

Pay Station Volume Activity - Oregon

Month	Oregon			Consumer Fee Assessed	
	Check	Cash	Total	Oreg	
	Jan-10	830	5,551	6,381	\$
Feb-10	743	5,306	6,049	\$	6,049
Mar-10	878	6,225	7,103	\$	7,103
Apr-10	808	5,619	6,427	\$	6,427
May-10	675	5,058	5,733	\$	5,733
Jun-10	606	4,971	5,577	\$	5,577
Jul-10	528	4,598	5,126	\$	7,689
Aug-10	496	4,455	4,951	\$	7,427
Sep-10	443	4,024	4,467	\$	6,701
Oct-10	367	3,803	4,170	\$	6,255
Nov-10	406	3,764	4,170	\$	6,255
Dec-10	430	4,075	4,505	\$	6,758
Total	7,210	57,449	72,215	\$	78,355
%		80%			

NW Natural
Oregon General Rate Case - December 2011

Pay Station Activity - System

	2008 (counts)	2009 (counts)	2010 (counts)
Total Pay Station Payments (System)	86,272	84,838	75,288
Payments during Credit Activity:			
20 day notices	4,928	5,074	4,103
5 day notices	8,083	7,538	6,228
3 day call ahead	5,264	4,547	4,046
Open Shut-off orders	4,355	3,987	3,345
Total Delinquent Payments	22,630	21,146	17,722
% of Total Payments	26.2%	24.9%	23.5%

NW Natural
Oregon General Rate Case - December 2011

Bank Card Activity - System

	2008 (counts)	2009 (counts)	2010 (counts)
Total Bank Card Payments (System)	115,891	124,732	135,489
Payments during Credit Activity:			
20 day notices	7,804	8,627	8,160
5 day notices	9,552	9,666	9,352
3 day call ahead	5,965	5,841	5,824
Open Shut-off orders	6,959	7,224	7,663
Total Delinquent Payments	30,280	31,358	30,999
% of Total Payments	26.1%	25.1%	22.9%

NW Natural
Oregon General Rate Case - December 2011

Other Payment Activity - System

	2008 (counts)	2009 (counts)	2010 (counts)
Total All Other Payment Channels (System)	6,940,321	6,627,651	7,183,158
20 day notices	107,839	108,667	92,385
5 day notices	73,667	72,344	65,444
3 day call ahead	27,166	27,060	26,195
Open Shut-off orders	24,943	22,829	22,633
Total Delinquent Payments	233,615	230,900	206,657
% of Total Payments	3.4%	3.5%	2.9%

Environmental Cost Recovery Hypothetical Scenario

(\$ in thousands)

NOTE: The purpose of this model is to present a hypothetical cost scenario for purposes of illustrating how the proposed Site Remediation Recovery Mechanism would operate in that scenario. The costs contained in this table do not represent actual or forecast costs or NW Natural's actual expectations of what insurance recoveries it will receive.

General assumptions:

- Annual expenditures are made during the first 10 years with payments evenly spread
- Clean-up is completed and final expenditures are made by 10/31/2021
- Expenditures are collected on a 5-year rolling basis

Inputs:

WACC (proposed)	8.28%
Modified blended rate (proposed)	2.01%
Expenditures and interest - 10/31/11	65,000
Future expenditures	100,000
	<u>165,000</u>
Less insurance recoveries	
2012	(35,000)
2014	(25,000)
2017	<u>(25,000)</u>
	<u>(85,000)</u>
Net expenditures	80,000

SUMMARY						
PGA Year	Current Expenditures	Insurance Recovery	Collected	Interest	End Balance 10/31	1/5th of Balance
2010	-	-	-	-	65,000	13,000
2011	10,000	(35,000)	-	5,894	45,894	9,179
2012	10,000	-	(9,179)	1,604	48,320	9,664
2013	10,000	-	(12,170)	1,362	47,511	9,502
2014	10,000	(25,000)	(14,290)	(550)	17,670	3,534
2015	10,000	-	(10,978)	550	17,242	3,448
2016	10,000	-	(12,467)	725	15,500	3,100
2017	10,000	(25,000)	(5,364)	(1,109)	(5,974)	(1,195)
2018	10,000	-	26	181	4,233	847
2019	10,000	-	448	591	15,272	3,054
2020	10,000	-	(5,138)	760	20,895	4,179
2021	-	-	(5,345)	370	15,919	4,179
2022	-	-	(3,357)	289	12,851	4,179
2023	-	-	(6,550)	194	6,496	4,179
2024	-	-	(4,029)	83	2,550	4,179
2025	-	-	(2,554)	4	-	-
TOTAL	100,000	(85,000)	(90,948)	10,948		

Environmental Cost Recovery Model

(\$ in thousands)

NOTE: The purpose of this model is to present a hypothetical cost scenario for purposes of illustrating how the proposed Site Remediation Recovery Mechanism would operate in that scenario. The costs contained in this table do not represent actual or forecast costs or NW Natural's actual expectations of what insurance recoveries it will receive. They also do not address the treatment of deferred taxes associated with the expenditures on environmental remediation.

Inputs:

Inputs in blue font may be changed

WACC (proposed)	8.28%
Modified blended rate (proposed)	2.01%
Period of expenditures (in months)	10
Expenditures and interest - 10/31/11	65,000
Future expenditures	100,000
	<u>165,000</u>

Less insurance recoveries	
2012	(35,000)
2014	(25,000)
2017	(25,000)
	<u>(85,000)</u>

Net expenditures 80,000

PGA year	Calendar Year	Period	DEFERRAL (Asset)					RECOVERY (Asset)			
			Current Expenditures	Transfers Out	Insurance Recovery	Interest (WACC)	End Bal 10/31	Transfers In	Collected/ Amort.	Interest (blended rate)	End Bal 10/31
2010	2011	10	-	-	-	-	65,000	-	-	-	-
2011	2011	11	833.33	-	-	451	66,285	-	-	-	-
2011	2011	12	833.33	-	-	460	67,578	-	-	-	-
2011	2012	1	833.33	-	-	469	68,881	-	-	-	-
2011	2012	2	833.33	-	-	478	70,192	-	-	-	-
2011	2012	3	833.33	-	-	487	71,513	-	-	-	-
2011	2012	4	833.33	-	-	496	72,842	-	-	-	-
2011	2012	5	833.33	-	-	505	74,181	-	-	-	-
2011	2012	6	833.33	-	-	515	75,529	-	-	-	-
2011	2012	7	833.33	-	-	524	76,887	-	-	-	-
2011	2012	8	833.33	-	-	533	78,253	-	-	-	-
2011	2012	9	833.33	-	-	543	79,630	-	-	-	-
2011	2012	10	833.33	-	(35,000)	432	45,894	-	-	-	-
2012	2012	11	833.33	(45,894)	-	320	1,153	45,894	(765)	76	45,206
2012	2012	12	833.33	-	-	11	1,997	-	(765)	75	44,516
2012	2013	1	833.33	-	-	17	2,847	-	(765)	74	43,825
2012	2013	2	833.33	-	-	23	3,703	-	(765)	73	43,133

		DEFERRAL (Asset)						RECOVERY (Asset)			
PGA year	Calendar Year	Period	Current Expenditures	Transfers Out	Insurance Recovery	Interest (WACC)	End Bal 10/31	Transfers In	Collected/ Amort.	Interest (blended rate)	End Bal 10/31
2012	2013	3	833.33	-	-	28	4,565	-	(765)	72	42,440
2012	2013	4	833.33	-	-	34	5,432	-	(765)	70	41,745
2012	2013	5	833.33	-	-	40	6,306	-	(765)	69	41,049
2012	2013	6	833.33	-	-	46	7,186	-	(765)	68	40,353
2012	2013	7	833.33	-	-	52	8,072	-	(765)	67	39,655
2012	2013	8	833.33	-	-	59	8,963	-	(765)	66	38,956
2012	2013	9	833.33	-	-	65	9,862	-	(765)	65	38,255
2012	2013	10	833.33	-	-	71	10,766	-	(765)	63	37,554
2013	2013	11	833.33	(10,766)	-	77	910	10,766	(1,014)	80	47,385
2013	2013	12	833.33	-	-	9	1,753	-	(1,014)	79	46,450
2013	2014	1	833.33	-	-	15	2,601	-	(1,014)	77	45,513
2013	2014	2	833.33	-	-	21	3,455	-	(1,014)	75	44,574
2013	2014	3	833.33	-	-	27	4,315	-	(1,014)	74	43,633
2013	2014	4	833.33	-	-	33	5,181	-	(1,014)	72	42,691
2013	2014	5	833.33	-	-	39	6,053	-	(1,014)	71	41,748
2013	2014	6	833.33	-	-	45	6,931	-	(1,014)	69	40,803
2013	2014	7	833.33	-	-	51	7,815	-	(1,014)	67	39,856
2013	2014	8	833.33	-	-	57	8,706	-	(1,014)	66	38,908
2013	2014	9	833.33	-	-	63	9,602	-	(1,014)	64	37,958
2013	2014	10	833.33	-	-	69	10,504	-	(1,014)	63	37,006
2014	2014	11	833.33	(10,504)	-	75	909	10,504	(1,191)	79	46,399
2014	2014	12	833.33	-	(25,000)	(77)	(23,335)	-	(1,191)	77	45,284
2014	2015	1	833.33	-	-	(158)	(22,660)	-	(1,191)	75	44,168
2014	2015	2	833.33	-	-	(153)	(21,980)	-	(1,191)	73	43,051
2014	2015	3	833.33	-	-	(149)	(21,295)	-	(1,191)	71	41,931
2014	2015	4	833.33	-	-	(144)	(20,606)	-	(1,191)	69	40,809
2014	2015	5	833.33	-	-	(139)	(19,912)	-	(1,191)	67	39,686
2014	2015	6	833.33	-	-	(135)	(19,213)	-	(1,191)	65	38,560
2014	2015	7	833.33	-	-	(130)	(18,510)	-	(1,191)	64	37,433
2014	2015	8	833.33	-	-	(125)	(17,801)	-	(1,191)	62	36,304
2014	2015	9	833.33	-	-	(120)	(17,088)	-	(1,191)	60	35,173
2014	2015	10	833.33	-	-	(115)	(16,370)	-	(1,191)	58	34,040
2015	2015	11	833.33	16,370	-	(110)	723	(16,370)	(915)	29	16,784
2015	2015	12	833.33	-	-	8	1,564	-	(915)	27	15,897
2015	2016	1	833.33	-	-	14	2,411	-	(915)	26	15,008
2015	2016	2	833.33	-	-	20	3,264	-	(915)	24	14,117
2015	2016	3	833.33	-	-	25	4,123	-	(915)	23	13,225
2015	2016	4	833.33	-	-	31	4,988	-	(915)	21	12,332
2015	2016	5	833.33	-	-	37	5,858	-	(915)	20	11,437
2015	2016	6	833.33	-	-	43	6,735	-	(915)	18	10,541
2015	2016	7	833.33	-	-	49	7,618	-	(915)	17	9,643
2015	2016	8	833.33	-	-	55	8,506	-	(915)	15	8,743
2015	2016	9	833.33	-	-	62	9,401	-	(915)	14	7,842
2015	2016	10	833.33	-	-	68	10,302	-	(915)	12	6,940
2016	2016	11	833.33	(10,302)	-	74	907	10,302	(1,039)	28	16,231
2016	2016	12	833.33	-	-	9	1,750	-	(1,039)	26	15,219

		DEFERRAL (Asset)						RECOVERY (Asset)				
PGA year	Calendar Year	Period	Current Expenditures	Transfers Out	Insurance Recovery	Interest (WACC)	End Bal 10/31	Transfers In	Collected/ Amort.	Interest (blended rate)	End Bal 10/31	
2016	2017	1	833.33	-	-	15	2,598	-	(1,039)	25	14,204	
2016	2017	2	833.33	-	-	21	3,452	-	(1,039)	23	13,188	
2016	2017	3	833.33	-	-	27	4,312	-	(1,039)	21	12,171	
2016	2017	4	833.33	-	-	33	5,178	-	(1,039)	20	11,151	
2016	2017	5	833.33	-	-	39	6,050	-	(1,039)	18	10,130	
2016	2017	6	833.33	-	-	45	6,928	-	(1,039)	16	9,107	
2016	2017	7	833.33	-	-	51	7,812	-	(1,039)	14	8,083	
2016	2017	8	833.33	-	-	57	8,702	-	(1,039)	13	7,056	
2016	2017	9	833.33	-	-	63	9,598	-	(1,039)	11	6,028	
2016	2017	10	833.33	-	-	69	10,501	-	(1,039)	9	4,999	
2017	2017	11	833.33	(10,501)	-	75	909	10,501	(447)	26	15,078	
2017	2017	12	833.33	-	(25,000)	(77)	(23,335)	-	(447)	25	14,656	
2017	2018	1	833.33	-	-	(158)	(22,660)	-	(447)	24	14,233	
2017	2018	2	833.33	-	-	(153)	(21,980)	-	(447)	23	13,810	
2017	2018	3	833.33	-	-	(149)	(21,296)	-	(447)	23	13,385	
2017	2018	4	833.33	-	-	(144)	(20,606)	-	(447)	22	12,960	
2017	2018	5	833.33	-	-	(139)	(19,912)	-	(447)	21	12,535	
2017	2018	6	833.33	-	-	(135)	(19,213)	-	(447)	21	12,108	
2017	2018	7	833.33	-	-	(130)	(18,510)	-	(447)	20	11,681	
2017	2018	8	833.33	-	-	(125)	(17,801)	-	(447)	19	11,253	
2017	2018	9	833.33	-	-	(120)	(17,088)	-	(447)	18	10,825	
2017	2018	10	833.33	-	-	(115)	(16,370)	-	(447)	18	10,395	
2018	2018	11	833.33	16,370	-	(110)	723	(16,370)	2	(10)	(5,982)	
2018	2018	12	833.33	-	-	8	1,564	-	2	(10)	(5,990)	
2018	2019	1	833.33	-	-	14	2,411	-	2	(10)	(5,998)	
2018	2019	2	833.33	-	-	20	3,264	-	2	(10)	(6,006)	
2018	2019	3	833.33	-	-	25	4,123	-	2	(10)	(6,014)	
2018	2019	4	833.33	-	-	31	4,988	-	2	(10)	(6,021)	
2018	2019	5	833.33	-	-	37	5,858	-	2	(10)	(6,029)	
2018	2019	6	833.33	-	-	43	6,735	-	2	(10)	(6,037)	
2018	2019	7	833.33	-	-	49	7,618	-	2	(10)	(6,045)	
2018	2019	8	833.33	-	-	55	8,506	-	2	(10)	(6,053)	
2018	2019	9	833.33	-	-	62	9,401	-	2	(10)	(6,061)	
2018	2019	10	833.33	-	-	68	10,302	-	2	(10)	(6,069)	
2019	2019	11	833.33	(10,302)	-	74	907	10,302	37	7	4,278	
2019	2019	12	833.33	-	-	9	1,750	-	37	7	4,322	
2019	2020	1	833.33	-	-	15	2,598	-	37	7	4,367	
2019	2020	2	833.33	-	-	21	3,452	-	37	7	4,411	
2019	2020	3	833.33	-	-	27	4,312	-	37	7	4,456	
2019	2020	4	833.33	-	-	33	5,178	-	37	7	4,501	
2019	2020	5	833.33	-	-	39	6,050	-	37	8	4,546	
2019	2020	6	833.33	-	-	45	6,928	-	37	8	4,591	
2019	2020	7	833.33	-	-	51	7,812	-	37	8	4,636	
2019	2020	8	833.33	-	-	57	8,702	-	37	8	4,681	
2019	2020	9	833.33	-	-	63	9,598	-	37	8	4,726	
2019	2020	10	833.33	-	-	69	10,501	-	37	8	4,771	

DEFERRAL (Asset)								RECOVERY (Asset)			
PGA year	Calendar Year	Period	Current Expenditures	Transfers Out	Insurance Recovery	Interest (WACC)	End Bal 10/31	Transfers In	Collected/ Amort.	Interest (blended rate)	End Bal 10/31
2020	2020	11	833.33	(10,501)	-	75	909	10,501	(428)	25	14,869
2020	2020	12	833.33	-	-	9	1,751	-	(428)	25	14,466
2020	2021	1	833.33	-	-	15	2,599	-	(428)	24	14,061
2020	2021	2	833.33	-	-	21	3,454	-	(428)	23	13,656
2020	2021	3	833.33	-	-	27	4,314	-	(428)	23	13,251
2020	2021	4	833.33	-	-	33	5,180	-	(428)	22	12,845
2020	2021	5	833.33	-	-	39	6,052	-	(428)	21	12,438
2020	2021	6	833.33	-	-	45	6,929	-	(428)	20	12,030
2020	2021	7	833.33	-	-	51	7,814	-	(428)	20	11,622
2020	2021	8	833.33	-	-	57	8,704	-	(428)	19	11,212
2020	2021	9	833.33	-	-	63	9,600	-	(428)	18	10,803
2020	2021	10	833.33	-	-	69	10,502	-	(428)	18	10,392
2021	2021	11	-	(10,502)	-	-	-	10,502	(445)	35	20,484
2021	2021	12	-	-	-	-	-	-	(445)	34	20,072
2021	2022	1	-	-	-	-	-	-	(445)	33	19,660
2021	2022	2	-	-	-	-	-	-	(445)	33	19,247
2021	2022	3	-	-	-	-	-	-	(445)	32	18,834
2021	2022	4	-	-	-	-	-	-	(445)	31	18,419
2021	2022	5	-	-	-	-	-	-	(445)	30	18,005
2021	2022	6	-	-	-	-	-	-	(445)	30	17,589
2021	2022	7	-	-	-	-	-	-	(445)	29	17,173
2021	2022	8	-	-	-	-	-	-	(445)	28	16,755
2021	2022	9	-	-	-	-	-	-	(445)	28	16,338
2021	2022	10	-	-	-	-	-	-	(445)	27	15,919
2022	2022	11	-	-	-	-	-	-	(280)	26	15,666
2022	2022	12	-	-	-	-	-	-	(280)	26	15,412
2022	2023	1	-	-	-	-	-	-	(280)	26	15,158
2022	2023	2	-	-	-	-	-	-	(280)	25	14,903
2022	2023	3	-	-	-	-	-	-	(280)	25	14,648
2022	2023	4	-	-	-	-	-	-	(280)	24	14,393
2022	2023	5	-	-	-	-	-	-	(280)	24	14,137
2022	2023	6	-	-	-	-	-	-	(280)	23	13,881
2022	2023	7	-	-	-	-	-	-	(280)	23	13,624
2022	2023	8	-	-	-	-	-	-	(280)	23	13,367
2022	2023	9	-	-	-	-	-	-	(280)	22	13,109
2022	2023	10	-	-	-	-	-	-	(280)	22	12,851
2023	2023	11	-	-	-	-	-	-	(546)	21	12,326
2023	2023	12	-	-	-	-	-	-	(546)	20	11,801
2023	2024	1	-	-	-	-	-	-	(546)	19	11,274
2023	2024	2	-	-	-	-	-	-	(546)	18	10,747
2023	2024	3	-	-	-	-	-	-	(546)	18	10,219
2023	2024	4	-	-	-	-	-	-	(546)	17	9,689
2023	2024	5	-	-	-	-	-	-	(546)	16	9,159
2023	2024	6	-	-	-	-	-	-	(546)	15	8,628
2023	2024	7	-	-	-	-	-	-	(546)	14	8,096
2023	2024	8	-	-	-	-	-	-	(546)	13	7,564

		DEFERRAL (Asset)						RECOVERY (Asset)			
PGA year	Calendar Year	Period	Current Expenditures	Transfers Out	Insurance Recovery	Interest (WACC)	End Bal 10/31	Transfers In	Collected/ Amort.	Interest (blended rate)	End Bal 10/31
2023	2024	9	-	-	-	-	-	-	(546)	12	7,030
2023	2024	10	-	-	-	-	-	-	(546)	11	6,496
2024	2024	11	-	-	-	-	-	-	(366)	11	6,140
2024	2024	12	-	-	-	-	-	-	(366)	10	5,784
2024	2025	1	-	-	-	-	-	-	(366)	9	5,427
2024	2025	2	-	-	-	-	-	-	(366)	9	5,069
2024	2025	3	-	-	-	-	-	-	(366)	8	4,711
2024	2025	4	-	-	-	-	-	-	(366)	8	4,353
2024	2025	5	-	-	-	-	-	-	(366)	7	3,993
2024	2025	6	-	-	-	-	-	-	(366)	6	3,633
2024	2025	7	-	-	-	-	-	-	(366)	6	3,273
2024	2025	8	-	-	-	-	-	-	(366)	5	2,912
2024	2025	9	-	-	-	-	-	-	(366)	5	2,550
2025	2025	10	-	-	-	-	-	-	(366)	4	2,188
2025	2026	11	-	-	-	-	-	-	(191)		1,997
2025	2026	12	-	-	-	-	-	-	(191)		1,805
2025	2026	1	-	-	-	-	-	-	(191)		1,614
2025	2026	2	-	-	-	-	-	-	(191)		1,423
2025	2026	3	-	-	-	-	-	-	(191)		1,232
2025	2026	4	-	-	-	-	-	-	(191)		1,040
2025	2026	5	-	-	-	-	-	-	(191)		849
2025	2026	6	-	-	-	-	-	-	(191)		658
2025	2026	7	-	-	-	-	-	-	(191)		467
2025	2026	8	-	-	-	-	-	-	(191)		275
2025	2026	9	-	-	-	-	-	-	(191)		84
2025	2026	10	-	-	-	-	-	-	(84)		-
			100,000	(86,534)	(85,000)	6,534			(90,948)	4,414	

DEFERRAL (Asset)

RECOVERY (Asset)

PGA year	Calendar Year	Period	Current Expenditures	Transfers Out	Insurance Recovery	Interest (WACC)	End Bal 10/31
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Transfers In	Collected/ Amort.	Interest (blended rate)	End Bal 10/31
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SUMMARY						
PGA Year	Current Expenditures	Insurance Recovery	Collected	Interest	End Balance 10/31	1/5th of Balance
2010	-	-	-	-	65,000	13,000
2011	10,000	(35,000)	-	5,894	45,894	9,179
2012	10,000	-	(9,179)	1,604	48,320	9,664
2013	10,000	-	(12,170)	1,362	47,511	9,502
2014	10,000	(25,000)	(14,290)	(550)	17,670	3,534
2015	10,000	-	(10,978)	550	17,242	3,448
2016	10,000	-	(12,467)	725	15,500	3,100
2017	10,000	(25,000)	(5,364)	(1,109)	(5,974)	(1,195)
2018	10,000	-	26	181	4,233	847
2019	10,000	-	448	591	15,272	3,054
2020	10,000	-	(5,138)	760	20,895	4,179
2021	-	-	(5,345)	370	15,919	4,179
2022	-	-	(3,357)	289	12,851	4,179
2023	-	-	(6,550)	194	6,496	4,179
2024	-	-	(4,029)	83	2,550	4,179
2025	-	-	(2,554)	4	-	-
TOTAL	100,000	(85,000)	(90,948)	10,948		

NW Natural
 Rates & Regulatory Affairs
 Proposed State Allocation of Environmental Deferrals

NWN/1503
 Miller/1

Year	Gas Volumes Sold		Washington % Gas Volumes Sold
	Washington	System	
1925	49,060	4,130,818	1.19%
1926	52,150	3,998,203	1.30%
1927	59,070	4,362,441	1.35%
1928	64,710	4,335,864	1.49%
1929	78,102	4,435,926	1.76%
1930	82,788	4,341,878	1.91%
1931	80,833	3,996,857	2.02%
1932	73,077	3,721,513	1.96%
1933	60,020	3,329,499	1.80%
1934	58,294	2,967,388	1.96%
1935	60,388	3,367,475	1.79%
1936	66,167	3,598,131	1.84%
1937	76,592	3,890,948	1.97%
1938	80,418	3,926,566	2.05%
1939	84,615	3,978,949	2.13%
1940	101,524	4,183,852	2.43%
1941	128,591	4,065,870	3.16%
1942	179,752	5,160,805	3.48%
1943	218,537	5,925,699	3.69%
1944	225,971	6,248,702	3.62%
1945	260,899	7,050,560	3.70%
1946	282,474	5,984,619	4.72%
1947	301,472	6,078,065	4.96%
1948	313,922	6,203,992	5.06%
1949	303,749	6,038,748	5.03%
1950	413,877	8,997,327	4.60%
1951	391,543	8,511,795	4.60%
1952	394,493	8,575,939	4.60%
1953	376,454	8,183,793	4.60%
1954	276,767	6,644,537	4.17%
1955	288,932	8,834,971	3.27%
1956	292,045	8,930,158	3.27%
<hr/>			
Total	5,777,286	174,001,886	3.32%

Notes/Legend:

- Derived from available data
- The % from 1955 is repeated for 1956 due to lack of data

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Year	Gas Volumes Sold		Washington % Gas Volumes Sold
	Washington	System	
1922	36,292	3,166,707	1.15%
1923	31,508	3,329,937	0.95%
1924	30,167	3,887,222	0.78%
1925	49,060	4,130,818	1.19%
1926	52,150	3,998,203	1.30%
1927	59,070	4,362,441	1.35%
1928	64,710	4,335,864	1.49%
1929	78,102	4,435,926	1.76%
1930	82,788	4,341,878	1.91%
1931	80,833	3,996,857	2.02%
1932	73,077	3,721,513	1.96%
1933	60,020	3,329,499	1.80%
1934	58,294	2,967,388	1.96%
1935	60,388	3,367,475	1.79%
1936	66,167	3,598,131	1.84%
1937	76,592	3,890,948	1.97%
1938	80,418	3,926,566	2.05%
1939	84,615	3,978,949	2.13%
1940	101,524	4,183,852	2.43%
1941	128,591	4,065,870	3.16%
1942	179,752	5,160,805	3.48%
1943	218,537	5,925,699	3.69%
1944	225,971	6,248,702	3.62%
1945	260,899	7,050,560	3.70%
1946	282,474	5,984,619	4.72%
1947	301,472	6,078,065	4.96%
1948	313,922	6,203,992	5.06%
1949	303,749	6,038,748	5.03%
1950	413,877	8,997,327	4.60%
1951	391,543	8,511,795	4.60%
1952	394,493	8,575,939	4.60%
1953	376,454	8,183,793	4.60%
1954	276,767	6,644,537	4.17%
1955	288,932	8,834,971	3.27%
1956	292,045	8,930,158	3.27%
			2.98% average of WA %
			3.32% sum of volumes
			3.320% average of volumes

HISTORICAL FORECAST

YEAR	Total Gas Sendout (1000 CF)	WA Sales*	WA % of Sales	Total Customers	WA Customers	WA % of Customers
1922	3166707	36292	1.15%	74929	1102	1.47%
1923	3329937	31508	0.95%	79228	1071	1.35%
1924	3887222	30167	0.78%	83807	1105	1.32%
1925	4130818	49060	1.19%	87879	1552	1.77%
1926	3998203	52150	1.30%	90861	1661	1.83%
1927	4362441	59070	1.35%	91790	1770	1.93%
1928	4335864	64710	1.49%	91530	1879	2.05%
1929	4435926	70750	1.59%	92056	1988	2.16%
1930	4341878	74600	1.72%	91911	2097	2.28%
1931	3996857	81030	2.03%	90830	2206	2.43%
1932	3721513	89800	2.41%	84030	2315	2.75%
1933	3329499	94310	2.83%	80398	2424	3.02%
1934	2967388	102650	3.46%	80768	2533	3.14%
1935	3367475	108750	3.23%	80685	2642	3.27%
1936	3598131	116090	3.23%	81369	2751	3.38%
1937	3890948	123650	3.18%	84401	2860	3.39%
1938	3926566	131600	3.35%	84441	2969	3.52%
1939	3978949	139660	3.51%	86072	3078	3.58%
1940	4183852	148170	3.54%	86542	3187	3.68%

*based on 1926 forecast after 1925 (assumed around 7% growth)

MANUFACTURED GAS SALES IN WASHINGTON

Year	No. of Customers	Volume of Gas Sold (MCF)	Percentage of Total that is WA	WA Gas Sales	Total System Gas Sales	NOTES
1929	2,323	78,102		\$84,621.73		
1930	2,350	82,788	2.23%	\$86,733.05	\$3,891,776.52 *	*1930 - 1937 % of Total in WA is based on WA gas sales revenue/total gas sales revenue
1931	2,259	80,833	2.32%	\$83,851.38	\$3,622,060.61 *	
1932	2,081	73,077	2.26%	\$77,844.35	\$3,448,702.30 *	
1933	2,089	60,020	2.16%	\$64,447.93	\$2,981,311.81 *	
1934	2,325	58,294	2.43%	\$63,869.40	\$2,625,571.32 *	
1935	2,258	60,388	2.39%	\$64,415.16	\$2,693,549.56 *	
1936	2,294	66,167	2.12%	\$66,167.00	\$3,126,110.00 *	
1937	2,383	76,592	2.47%	\$71,378.58	\$2,887,482.13 *	
1938	2,467	80,418		\$71,844.41		
1939	2,629	84,615		\$74,578.71		
1940	2,819	101,524		\$85,361.57		
1941	3,023	128,591		\$99,278.05		
1942	3,319	179,752		\$129,777.99		
1943	3,519	218,537		\$157,466.85		
1944	3,697	225,971		\$167,217.15		
1945	3,977	260,899		\$190,241.52		
1946	4,090	282,474	4.72%	\$212,466.52	\$4,501,409.32 **	** percentage sold in WA was reported 1946 through 1949
1947	4,174	301,472	4.96%	\$256,990.00	\$5,181,250.00 **	
1948	4,067	313,922	5.06%	\$380,286.83	\$7,515,550.00 **	
1949	3,928	303,749	5.03%	\$311,301.55	\$6,188,897.61 **	
1950	82,384	8,997,327	4.60%	\$359,153.04	\$7,807,674.83 ***	***Results for total system only reported for 1950 through 1953, 1956 through 1958. However, footnote provides says, "1950, 1951, 1952 and 1953 figures include total operations of Portland Gas and Coke Company, of figures of which approximately 95.4% is in Oregon."
1951	79,767	8,511,795	4.60%	\$388,024.28	\$8,435,310.54 ***	
1952	76,173	8,575,939	4.60%	\$398,397.27	\$8,660,810.28 ***	
1953	74,292	8,183,793	4.60%	\$509,271.06	\$11,071,109.92 ***	
1954	2,741	276,767	4.17%	\$382,042.37	\$9,171,955.20	
1955	2,818	288,932	3.27%	\$323,372.00	\$9,888,078.00	
1956	64,290	8,930,158			\$10,185,771.81	
1957	98,680				\$14,466,462.00	
1958	72,038				\$17,365,394.00	

203,121,599 total system therms sold
259,464,034 therms sold on total system

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