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December 11, 2012

***VIA ELECTRONIC FILING***

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

Attn: Filing Center

**Re: AR 568 – Housekeeping changes to OAR 860-027-0015**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), submits the following comments in the above-referenced docket.

1. NW Natural does not oppose the removal of large telecommunications from this rule.
2. NW Natural is subject to the reporting requirement under OAR 860-027-0015. The December 31 filing date stated in the rule is and has historically been problematic because NW Natural’s fiscal year is on a calendar year basis. Because NW Natural is unable to meet the December 31 filing date, each year NW Natural must request an extension of time in which to file the report. Assuming that the interest of the Commission is to obtain reporting of expected projects timely with the utility’s upcoming budget, it may also be that the December 31 filing date is out of synch with utilities whose fiscal year is on a non-calendar year basis. Based on these assumptions, NW Natural offers additional suggested revisions to this rule for the Commission’s consideration:

Each energy and large telecommunications utility operating within Oregon is required to file annually no later than sixty days after the beginning of the utility’s fiscal year, on or before December 31 on forms approved by the Commission information on budgeted new construction, extensions, and additions to the utility’s property.

3. For the same reasons stated under item 2. above, it may be appropriate to make similar changes to OAR 860-027-0005, and NW Natural offers the following suggested revisions:

Each energy and large telecommunications utility operating within Oregon and having gross operating revenues of \$50,000 or more per annum is required to file with the Commission no later than sixty days after the beginning of the utility’s fiscal year on or before the first day of November of each year, a copy of its proposed Budget of Expenditures, on forms approved by the Commission.

NW Natural appreciates the opportunity to submit comments in this rulemaking docket. Please direct any questions regarding these comments to me and to e-Filing as follows:

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Sincerely,

NW NATURAL

*/s/ Onita R. King*

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