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January 4, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

Re: UM 1909 - NW Natural's Petition to Intervene and Waiver of Paper Service

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), hereby files a petition to intervene in the Public Utility Commission of Oregon's (the "Commission") investigation into the Commission's legal authority to defer capital costs.

Please address correspondence on this matter to me with copies to:

NW Natural
eFiling for Rates & Regulatory Affairs
220 NW Second Avenue
Portland, Oregon 97209
Telecopier: (503) 721-2516
Telephone: (503) 226-4211, ext. 3589
eFiling@nwnatural.com

Respectfully submitted,

/s/ Zachary D. Kravitz

Zachary D. Kravitz
Associate Counsel

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1909

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation of the Commission's Legal
Authority to Defer Capital Costs

**NORTHWEST NATURAL GAS
COMPANY'S PETITION
TO INTERVENE
and Waiver of Paper Service**

1 Pursuant to ORS 756.525 and OAR 860-0001-0300, Northwest Natural Gas
2 Company ("NW Natural" or "Company") petitions the Public Utility Commission of
3 Oregon (the "Commission") to intervene in this proceeding with full party status. In
4 support of this petition, NW Natural states:

5 1.

6 NW Natural is a natural gas utility operating in the state of Oregon and is subject
7 to the supervision and regulation of the Commission.

8 2.

9 The name and address of the Company are:

10 Northwest Natural Gas Company
11 220 NW Second Ave.
12 Portland, OR 97209-3991

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3.

NW Natural wishes to waive paper service in this docket. Communications to NW Natural concerning this proceeding should be addressed to:

Zachary Kravitz
Associate Counsel
Northwest Natural Gas Company
220 NW Second Ave.
Portland, OR 97209
Telephone: (503) 220-2379
zachary.kravitz@nwnatural.com

and

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

In Docket UM 1791, the Portland General Electric Company requested to defer for later rate-making treatment the incremental revenue requirement associated with the Carty Generating Station. Following that request, Commission Staff began investigating whether the Commission has the authority to authorize a public utility to defer capital costs, and requested that a generic docket be opened because that decision would affect other public utilities and interested stakeholders. Accordingly, NW Natural has a direct and substantial interest in the issues raised in this proceeding as it relates to the Commission's authority to permit a public utility to defer capital costs under ORS 757.259(e). NW Natural's participation in this docket could assist the Commission in

1 resolving the issues. NW Natural will not unreasonably broaden the issues, burden the
2 record, or unreasonably delay the proceedings.

3 5.

4 Because no other party can adequately represent NW Natural's interests in this
5 proceeding, NW Natural respectfully requests that the Commission grant this Petition to
6 Intervene.

7 Dated this 4th day of January 2018.

Respectfully submitted,

NORTHWEST NATURAL GAS COMPANY

/s/Zachary D. Kravitz _____

Zachary D. Kravitz

Associate Counsel

NW Natural

220 NW Second Avenue

Portland, Oregon 97209-3991

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