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June 29, 2017

**VIA ELECTRONIC FILING**

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

**RE: UM 1101 - Application for Reauthorization to Defer Expenses for Intervenor Funding Grants**

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), hereby electronically files the above-referenced Application for Reauthorization to Defer Expenses for Intervenor Funding Grants.

A Notice concerning this Application will be sent to all parties who participated in the Company's most recently completed general rate case, UG 221. A Certificate of Service and a copy of the Notice are part of the enclosed Application.

If you have any questions, please call me at (503) 226.4211, ext. 5858.

Sincerely,

*/s/ Kyle Walker, CPA*

Kyle Walker, CPA  
Rates/Regulatory Affairs Analyst

Attachments

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

3 **UM 1101**

4 In the Matter of

5 NORTHWEST NATURAL GAS COMPANY,  
6 dba NW Natural,

APPLICATION

7 For Reauthorization to Defer Expenses for  
8 Intervenor Funding Grants  
9

10 In accordance with ORS 757.259 and OAR 860-027-0300, Northwest Natural  
11 Gas Company (“NW Natural” or the “Company”) files this application with the Public  
12 Utility Commission of Oregon (the “Commission”) requesting an order re-authorizing the  
13 Company to record and defer the cost of intervenor funding grants provided to qualifying  
14 organizations pursuant to the provisions of ORS 757.259(3) for future amortization in  
15 rates. This request is for the period July 1, 2017, through June 30, 2018.

16 In support of this Application, NW Natural states:

17 **A. NW Natural.**

18 NW Natural is a public utility in the State of Oregon and is subject to the  
19 jurisdiction of the Commission regarding rates, service, and accounting practices. NW  
20 Natural also provides retail natural gas service in the States of Oregon and Washington.

21 **B. Statutory Authority.**

22 ORS 757.072 (2) authorizes the Commission to approve written agreements for  
23 intervenor funding grants between electric and natural gas utilities and qualifying  
24 organizations representing broad customer interests. Such grants are used by these

1 qualifying organizations when participating in regulatory proceedings before the  
2 Commission. ORS 757.072(3) authorizes the Commission to establish rules with  
3 respect to funding agreements for determining which organizations are eligible for  
4 financial assistance, the amount of assistance that may be provided, the manner in  
5 which assistance will be distributed, and other necessary administrative matters.

6 Moreover, ORS 757.072(4) provides:

7 "The commission shall allow a public utility that provides  
8 financial assistance under this section to recover the  
9 amounts so provided in rates. The commission shall allow a  
10 public utility to defer inclusion of those amounts in rates as  
11 provided in ORS 757.259 if the public utility so elects."  
12

13 ORS 757.259(3), provides:

14 "Upon request of the public utility, the commission by order  
15 shall allow deferral of amounts provided as financial  
16 assistance under an agreement entered into under ORS  
17 757.072 for later incorporation in rates."  
18

19 Additionally, the Company notes that deferred amounts under ORS 757.259(3) are not  
20 subject to the percentage of gross revenues limitation on amortization or other  
21 provisions of subsections (5), (6), (7), (8), or (10) of ORS 757.259.

22 **C. Background of Request for Reauthorization.**

23 On July, 2, 2003, pursuant to Section 2 of the Intervenor Funding Act, the  
24 Commission issued Order No. 03-388, which, among other things, approved the  
25 Intervenor Funding Agreement among NW Natural, Portland General Electric,  
26 PacifiCorp, Cascade Natural Gas Corporation, Avista Corporation, Industrial Customers  
27 of Northwest Utilities ("ICNU"), Citizens' Utility Board ("CUB"), Northwest Industrial Gas

1 Users (“NWIGU”) (collectively referred to hereafter as “Joint Parties”), dated February 5,  
2 2003. The Intervenor Funding Agreement set forth the amount of funding to be  
3 contributed by each utility and the procedures for budget submittals by intervenors,  
4 Commission approval of budgets, and the payment of grants by utilities.

5 In its subsequent Order No. 03-405, the Commission directed the utilities to pay  
6 CUB the amount made available for the CUB Fund Grants as defined and provided for  
7 in the Intervenor Funding Agreement. Express Commission approval for payment was  
8 necessitated by Section 7.1 of the Intervenor Funding Agreement, which provides that  
9 “upon request by CUB, the Commission will direct the Participating Public Utilities to pay  
10 the amounts made available for the CUB Fund.”

11 On December 29, 2007, the Commission issued Order No. 07-564, which  
12 approved amendments to the Intervenor Funding Agreement previously approved in  
13 Order No. 03-388. In 2012, Joint Parties executed a Second Amended and Restated  
14 Intervenor Funding Agreement which the Commission approved in Order No. 12-452.  
15 This Second Amended and Restated Intervenor Funding Agreement, effective January  
16 1, 2013, through December 31, 2017, increased the CUB Fund, the Preauthorized  
17 Matching Fund, and the Issues Fund by 15% above the levels allowed in prior years.  
18 The Commission approved the Third Amended and Restated Intervenor Funding  
19 Agreement, effective August 1, 2015 through December 31, 2017, in Order No. 15-335.  
20 The amended Intervenor Funding Agreement increased the Issue Fund amount for NW  
21 Natural and for Avista Utilities. NW Natural’s Issue Fund amount was changed from  
22 \$66,125 to \$143,750.

1 **D. Communications.**

2 Communications regarding this Application should be addressed to:

3 NW Natural  
4 e-Filing for Regulatory Affairs  
5 220 NW Second Avenue  
6 Portland, Oregon 97209-3991  
7 Telephone: (503) 226-4211, ext. 3589  
8 Facsimile: (503) 721-2516  
9 Email: eFiling@nwnatural.com;

10  
11 Zachary D. Kravitz (OSB# 152870)  
12 Associate Counsel  
13 220 NW Second Avenue  
14 Portland, Oregon 97209-3991  
15 Phone: (503) 220-2379  
16 Email: zdk@nwnatural.com;

17  
18 and

19  
20 Kyle Walker, CPA  
21 Rates & Regulatory Affairs  
22 220 NW Second Avenue  
23 Portland, Oregon 97209-3991  
24 Phone: (503) 226-4211 Ext. 5858  
25 Email: Kyle.Walker@nwnatural.com  
26

27 **E. Description of the Expenses or Revenues for which Deferred Accounting is**  
28 **Requested – OAR 860-027-0300(3)(a).**

29 In accordance with the statutory authority provided by ORS 757.259(3), and the  
30 Commission's approval of the Third Amended and Restated Intervenor Funding  
31 Agreement, NW Natural proposes to record and defer the amount of its payment to  
32 CUB as directed by Commission Order No.15-335. The request is pursuant to the  
33 terms of the Third Amended and Restated Intervenor Funding Agreement, approved by  
34 the Commission in Order No. 15-335.

1           Additionally, the Company proposes to record and defer, on an ongoing basis,  
2 any and all Intervenor Funding Grants as defined and provided for in the Third  
3 Amended and Reinstated Intervenor Funding Agreement, for later incorporation in rates.  
4 The Company will record and defer these ongoing costs upon payment of the Intervenor  
5 Funding Grants following the Commission's approval of the Intervenor Funding Grant  
6 and issuance of an Order directing the Company to make payment, pursuant to the  
7 Third Amended and Restated Intervenor Funding Agreement.

8 **F.       Reasons for Application for Reauthorization of Deferred Accounting – OAR**  
9 **860-027-0300(3)(b).**

10           This request is made in accordance with ORS 757.259(3) that allows for the  
11 deferral of Intervenor funds, and Commission Order No. 15-335 in Docket No. UM 1357,  
12 which directs NW Natural to pay CUB the amounts made available for the CUB Fund  
13 Grants as defined and provided for in the Third Amended and Restated Intervenor  
14 Funding Agreement (\$66,125 for NW Natural).

15 **G.       Accounting – OAR 860-027-0300(3)(c).**

16           NW Natural proposes to record payment of Intervenor Funding Grants in a  
17 subaccount of Account 186. In the absence of the Commission's approval of this  
18 Application, the Company would not incur the cost of Intervenor Funding Grants. Were  
19 such costs incurred, however, they would be recorded in an appropriate sub-account of  
20 FERC Account 401.

21 ///

22 ///

1 **H. Estimated Accounts Subject to Deferral – OAR 860-027-0300(3)(d).**

2 Under the current agreement, the maximum amounts to be deferred during the 12-  
3 month period subsequent to the Application are:

<u>Fund</u>	
CUB Fund	\$ 66,125
Preauthorized Matching Fund	\$ 66,125
Issue Fund	<u>\$ 143,750</u>
Total	<u>\$ 276,000</u>

4 **I. A description and explanation of the entries in the deferred account to date**  
5 **of the application for reauthorization - OAR 860-027-0300(4)(a).**

6 Attached as Exhibit A to this application are work papers detailing the amounts  
7 deferred to-date under UM 1101.

8 **J. Reasons for Continued Deferral – OAR 860-027-0300(4)(b).**

9 The deferral is forecasted to continue as long as the Commission amends the  
10 Intervenor Funding Agreement which expires December 31, 2017.

11 **K. Requirement per Commission Order No. 09-263.**

12 Below is the information required per Commission Order No. 09-263, issued in  
13 Docket UM-1286, Staff's Investigation into Purchase Gas Adjustment Mechanisms:

- 14 **1. A completed Summary Sheet, the location in the PGA filing, and an**  
15 **account map that highlights the transfer of dollars from one account to**  
16 **another.**

17

1 Exhibit A provides the Summary Sheets which show the amounts deferred.

2 Exhibit A will be included in the 2017 PGA filing work papers and in the  
3 electronic file entitled "Proposed Temps Oregon 2017-18 PGA filing.xls."

4 **2. The effective date of the deferral.**

5 This application is for the 12-month period beginning July 1, 2017 and ending  
6 June 30, 2018.

7 **3. Prior year Order Number approving the deferral.**

8 Approval to defer costs associated with intervenor funding was last granted  
9 under Commission Order No. 16-296.

10 **4. The amount deferred last year.**

	<b>Issue Fund</b>	<b>CUB Fund</b>	<b>NWIGU Fund</b>
	<u>Acct 186284</u>	<u>Acct 186276</u>	<u>Acct 186278</u>
Deferred amounts July 1, 2016 through May 31, 2017	\$27,155	\$66,125	\$6,013

11  
12 **5. The amount amortized last year.**

	<b>CUB Fund</b>	<b>NWIGU Fund</b>
	<u>Acct 186286</u>	<u>Acct 186288</u>
Amortized amounts November 1, 2016 through May 31, 2017 with interest	\$133,211	\$33,521

13  
14 **6. The interest rate that will apply to the accounts.**

15 While the Company does not currently accrue interest on balances deferred for  
16 intervenor funding, the Company is authorized to include carrying costs in accordance  
17 with Section 7.9 of the Second Amended and Restated Agreement included as  
18



1 attachment A to Commission Order No. Order No. 12-452.

2 **7. An estimate of the upcoming PGA-period deferral and/or amortization.**

3 The Company estimates that it will defer, and ultimately seek to amortize up to  
4 \$276,000.

5 **L. Notice – OAR 800-027-0300(6).**

6 A notice of this Application has been served on the all parties who participated in  
7 the Company's most recent general rate case, UG 221, and is attached to this  
8 Application.

9 NW Natural respectfully requests that in accordance with ORS 757.259(3), as  
10 amended, the Commission authorize the Company to record and defer Intervenor  
11 Funding Grants incurred by the Company pursuant to the Intervenor Funding  
12 Agreement, as described in this Application.

13 DATED this 29<sup>th</sup> day of June 2017.

14 Respectfully Submitted,

15 NW NATURAL

16 /s/ Zachary D. Kravitz

17 Zachary D. Kravitz (OSB# 152870)

18 Associate Counsel

19 220 NW Second Avenue

20 Portland, Oregon 97209-3991

21 Phone: (503) 220-2379

22 Email: zdk@nwnatural.com  
23  
24

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Deferral of Intervenor Funding - ISSUE FUND  
 Account Number: 186284  
 Docket UM 1101  
 Last order for deferral reauthorization was Order No. 16-296

1	Debit	(Credit)									
2											
3											
4	Month/Year	Note	Deferral-CUB	Deferral-NWIGU	Transfers-CUB	Transfers-NWIGU	Interest (1)	Activity	Balance-CUB	Balance-NWIGU	Balance Grand Total
5	(a)	(b)	(c1)	(c2)	(d1)	(d2)	(e)	(f)	(g1)	(g2)	(gtotal)
6					to 186286	to 186288					
7					amort account	amort account					
8	Beginning Balance										
115	Oct-15	2		9,122				9,122	57,999	38,668	96,667.44
116	Nov-15	3			(40,159.41)	(29,545.73)		(69,705)	17,840	9,122	26,962.30
117	Dec-15	2	39,000					39,000	56,840	9,122	65,962.30
118	Jan-16	2		13,760				13,760	56,840	22,882	79,722.30
119	Feb-16							0	56,840	22,882	79,722.30
120	Mar-16	2		23,731				23,731	56,840	46,613	103,453.46
121	Apr-16							0	56,840	46,613	103,453.46
122	May-16							0	56,840	46,613	103,453.46
123	Jun-16							0	56,840	46,613	103,453.46
124	Jul-16							0	56,840	46,613	103,453.46
125	Aug-16		8,000	5,581				13,581	64,840	52,195	117,034.92
126	Sep-16							0	64,840	52,195	117,034.92
127	Oct-16							0	64,840	52,195	117,034.92
128	Nov-16	4			(56,840)	(46,613)		(103,453)	8,000	5,581	13,581.46
129	Dec-16	2	12,720					12,720	20,720	5,581	26,301.46
130	Jan-17	2		853				853	20,720	6,435	27,154.61
131	Feb-17							0	20,720	6,435	27,154.61
132	Mar-17							0	20,720	6,435	27,154.61
133	Apr-17							0	20,720	6,435	27,154.61
134	May-17							0	20,720	6,435	27,154.61

History truncated for ease of viewing

**NOTES**

- 1 - No interest is applied to this activity
- 2 - Payments made in:
  - October 2015 - see Order 15-301
  - December 2015 - see Order 16-030
  - January 2016 - see Order 16-030
  - March 2016 - see Order 16-108
  - August 2016 - see Order 16-279 (CUB) and Order 16-278 (NWIGU)
  - December 2016 - see Order 16-498
  - January 2017 - see Order 17-002
- 3 - Transfer \$40,159.41 of CUB June balance to 186286 amortization account  
 Transfer \$29,545.73 of NWIGU June balance to 186288 amortization account
- 4 - Transfer \$56,840 of CUB June balance to 186286 amortization account  
 Transfer \$46,613.46 of NWIGU June balance to 186288 amortization account

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Deferral of CUB Intervenor Funding  
 Account Number: 186276  
 Docket UM 1101  
 Last order for deferral reauthorization was Order No. 16-296

1	Debit	(Credit)					
2							
3							
4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
114	Oct-15		0			0	66,125
115	Nov-15	3	0	(66,125)		(66,125)	0
116	Dec-15		0			0	0
117	Jan-16	2	66,125			66,125	66,125
118	Feb-16		0			0	66,125
119	Mar-16		0			0	66,125
120	Apr-16		0			0	66,125
121	May-16		0			0	66,125
122	Jun-16		0			0	66,125
123	Jul-16		0			0	66,125
124	Aug-16		0			0	66,125
125	Sep-16		0			0	66,125
126	Oct-16		0			0	66,125
127	Nov-16	3	0	(66,125)		(66,125)	0
128	Dec-16		0			0	0
129	Jan-17	2	66,125			66,125	66,125
130	Feb-17		0			0	66,125
131	Mar-17		0			0	66,125
132	Apr-17		0			0	66,125
133	May-17		0			0	66,125

134  
 135  
 136 **History truncated for ease of viewing**

137  
 138 **NOTES**

- 139 **1** - No interest is applied to this activity  
 140  
 141 **2** - Payments made in:  
 142 Jan 2016 - see order 16-004  
 143 Jan 2017 - see order 17-003  
 144  
 145 **3** - June balance transferred to account 186286 for amortization

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Deferral of NWIGU Intervenor Funding  
 Account Number: 186278  
 Docket UM 1101  
 Last order for deferral reauthorization was Order No. 16-296

1	Debit	(Credit)					
2							
3							
4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
114	Oct-15		0			0	18,633
115	Nov-15	3	0	(18,633)		(18,633)	0
116	Dec-15		0			0	0
117	Jan-16		0			0	0
118	Feb-16		0			0	0
119	Mar-16	2	7,204			7,204	7,204
120	Apr-16		0			0	7,204
121	May-16		0			0	7,204
122	Jun-16		0			0	7,204
123	Jul-16		0			0	7,204
124	Aug-16		0			0	7,204
125	Sep-16		0			0	7,204
126	Oct-16		0			0	7,204
127	Nov-16	3	0	(7,204)		(7,204)	0
128	Dec-16		0			0	0
129	Jan-17		0			0	0
130	Feb-17		0			0	0
131	Mar-17		0			0	0
132	Apr-17	2	6,013			6,013	6,013
133	May-17		0			0	6,013

134  
 135 **History truncated for ease of viewing**

136  
 137 **NOTES**

- 138 **1** - No interest is applied to this activity
- 139
- 140 **2** - Payments made in:
- 141     March 2016 - see order 16-091
- 142     April 2017 - see order 17-130
- 143
- 144 **3** - June balance transferred to account 186288 for amortization

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Amortization of CUB Intervenor Funding  
 Account Number: 186286  
 Dockets UM 1101 and UG 306  
 Amortization of 2016 deferral approved in Order 16-400 of UG 306

1	Debit	(Credit)						
2								
3								
4	Month/Year	Note	Amortization	Transfers	Interest	Interest rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
6								
7	Beginning Balance							
123	Oct-15		(2,284)		27	1.77%	(2,257)	17,473
124	Nov-15 old rates		(2,306)		24	1.77%	(2,282)	15,191
125	Nov-15 new rates (1)		(4,545)	106,284	167	1.93%	101,906	117,098
126	Dec-15		(19,028)		173	1.93%	(18,855)	98,242
127	Jan-16		(22,471)		140	1.93%	(22,331)	75,912
128	Feb-16		(14,707)		110	1.93%	(14,596)	61,315
129	Mar-16		(12,707)		88	1.93%	(12,619)	48,696
130	Apr-16		(8,911)		71	1.93%	(8,839)	39,857
131	May-16		(5,291)		60	1.93%	(5,231)	34,626
132	Jun-16		(4,136)		52	1.93%	(4,083)	30,542
133	Jul-16		(3,027)		47	1.93%	(2,980)	27,562
134	Aug-16		(2,499)		42	1.93%	(2,457)	25,106
135	Sep-16		(2,783)		38	1.93%	(2,744)	22,361
136	Oct-16		(4,895)		32	1.93%	(4,863)	17,498
137	Nov-16 old rates		(4,489)		25	1.93%	(4,464)	13,034
138	Nov-16 new rates (1)		(4,281)	122,965	222	2.20%	118,905	131,939
139	Dec-16		(22,187)		222	2.20%	(21,966)	109,973
140	Jan-17		(35,219)		169	2.20%	(35,049)	74,924
141	Feb-17		(26,875)		113	2.20%	(26,762)	48,162
142	Mar-17		(20,319)		70	2.20%	(20,250)	27,912
143	Apr-17		(14,761)		38	2.20%	(14,724)	13,188
144	May-17		(10,415)		15	2.20%	(10,401)	2,787

145  
 146 **History truncated for ease of viewing**

147  
 148 **NOTES**

149 **1** - Transfer in represents June balances of deferral accounts 186276 and 186284.

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Amortization of NWIGU Intervenor Funding  
 Account Number: 186288  
 Dockets UM 1101 and UG 306  
 Amortization of 2016 deferral approved in Order 16-400 of UG 306

1	Debit	(Credit)						
2								
3								
4	Month/Year	Note	Amortization	Transfers	Interest	Interest rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(e2)	(f)	(g)
6								
7	Beginning Balance							
107	Oct-15		(2,854)		7	1.77%	(2,846)	3,593
108	Nov-15 old rates		(99)		5	1.77%	(93)	3,500
109	Nov-15 new rates (1)		(3,987)	48,179	74	1.93%	44,266	47,766
110	Dec-15		(4,514)		73	1.93%	(4,441)	43,324
111	Jan-16		(4,710)		66	1.93%	(4,644)	38,680
112	Feb-16		(4,089)		59	1.93%	(4,030)	34,651
113	Mar-16		(4,231)		52	1.93%	(4,179)	30,471
114	Apr-16		(3,888)		46	1.93%	(3,842)	26,629
115	May-16		(3,990)		40	1.93%	(3,950)	22,679
116	Jun-16		(3,694)		34	1.93%	(3,661)	19,019
117	Jul-16		(3,710)		28	1.93%	(3,682)	15,337
118	Aug-16		(3,804)		22	1.93%	(3,783)	11,554
119	Sep-16		(3,788)		16	1.93%	(3,773)	7,781
120	Oct-16		(4,160)		9	1.93%	(4,150)	3,631
121	Nov-16 old rates		(198)		6	1.93%	(193)	3,438
122	Nov-16 new rates (1)		(4,279)	53,818	95	2.20%	49,634	53,072
123	Dec-16		(5,106)		93	2.20%	(5,014)	48,059
124	Jan-17		(5,471)		83	2.20%	(5,388)	42,670
125	Feb-17		(4,825)		74	2.20%	(4,752)	37,919
126	Mar-17		(4,979)		65	2.20%	(4,914)	33,004
127	Apr-17		(4,612)		56	2.20%	(4,556)	28,448
128	May-17		(4,761)		48	2.20%	(4,714)	23,735

129  
 130 **History truncated for ease of viewing**

131  
 132 **NOTES**

133 **1** - Transfer in represents June balances of deferral accounts 186278 and 186284.



UM 1101

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO  
DEFER EXPENSES FOR INTERVENOR FUNDING GRANTS**

June 29, 2017

**To All Parties Who Participated in UG 221:**

Please be advised that on June 29, 2017 Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for Reauthorization to Defer Expenses for Intervenor Funding Grants, pursuant to provisions of ORS 757.259(2)(e). A copy of the Company's application is available for inspection at its main office or at the Public Utility of Oregon's ("Commission") eDocket website.

**This is not a rate case.** The purpose of this Notice is to inform parties that participated in the Company's most recent general rate case, UG 221, that a Reauthorization Deferral Application was filed.

Parties who desire more information or who wish to obtain a copy of the filing, or notice of the time and place of any hearing, if scheduled, should contact the Company or the Commission as follows:

**NW Natural**  
**Attn: Kyle Walker, CPA**  
**220 NW Second Avenue**  
**Portland, Oregon 97209-3991**  
**Telephone: (503) 226-4211 ext 5858**

**Public Utility Commission of Oregon**  
**Attn: Filing Center**  
**201 High Street SE, Suite 100**  
**PO Box 1088**  
**Salem, Oregon 97308-1088**  
**Telephone: (503) 378-6636**

Any person may submit to the Commission written comments on this matter by July 29, 2017. The granting of this Reauthorization of Deferral Application will not authorize a change in rates, but will permit the Company to defer amounts in rates to a subsequent proceeding.

\* \* \* \* \*



**CERTIFICATE OF SERVICE  
UM 1101**

I hereby certify that I have this day served the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER EXPENSES FOR INTERVENOR FUNDING GRANTS, upon all parties of record in docket UG 221, which is the Company's most recent general rate case, by electronic mail.

**UG 221**

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DATED June 29, 2017 at Portland, OR.

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