ONITA R. KING Rates & Regulatory Affairs Tel: 503.721.2452 Fax: 503.721.2516 Email: ork@nwnatural.com



July 31, 2015

NWN OPUC Advice No. 15-10 / UG

(UM 1406)

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: Schedule 177: Adjustments to Rates for System Integrity Program (SIP)

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company"), files herewith revisions and additions to its Tariff, P.U.C. Or. 25, stated to become effective with service on and after November 1, 2015, as follows:

Third Revision of Sheet 177-3, Schedule 177, "System Integrity Program (SIP) Recovery Mechanism (continued);"

Third Revision of Sheet 177-4, Schedule 177, "System Integrity Program (SIP) Recovery Mechanism (continued);"

First Revision Sheet 177-5, Schedule 177, "System Integrity Program (SIP) Recovery Mechanism (continued);" and

First Revision of Sheet 177-6, Schedule 177, "System Integrity Program (SIP) Recovery Mechanism (continued)."

The purpose of this filing is to develop the temporary adjustments to permanent rates associated with the Company's System Integrity Program (SIP): Part A, Bare Steel Replacement; Part B: Transmission Integrity Management (TIMP); and Part C: Distribution Integrity Management (DIMP) ended effective October 31, 2014. The Company last adjusted rates for this purpose effective November 1, 2014.

The Company filed a request with the Commission on October 21, 2014 to extend the SIP Mechanism (Docket UG 286). That request was suspended and an investigation into cost recovery for safety programs was initiated (Docket UM 1722). Although Parts B and C have expired, the Company does not remove references to these SIP components with this filing. Instead, they contain zero amounts. The Company will modify Schedule 177 as needed upon a final decision of the Commission in Dockets UG 286 and UM 1722.

Public Utility Commission of Oregon UG ____; NWN Advice No. OPUC 15-10 July 31, 2015, Page 2

The net effect of the SIP Part A and cost of service reserve amounts is an increase to the Company's annual revenues of \$582,277, or 0.09%. This is associated with just the Bare Steel investments. The other components of SIP are not operative.

The monthly bill of the average residential customer served under Rate Schedule 2 using 53 therms per month will increase by 6 cents. The monthly increase for the average commercial Rate Schedule 3 customer using 233 therms is about 22 cents, and the monthly increase for the average commercial Rate Schedule 31 customer using 3,324 therms is about \$3.00. The average Rate Schedule 32 firm sales industrial customer using 21,272 therms will see a monthly increase of about \$1.16. The average bill effects for all other rate schedule and service types can be found in the separately provided workpapers.

This filing also removes the temporary adjustments placed into rates November 1, 2014, associated with parts B and C, which has the effect of increasing the average bill for residential Schedule 2 customer using 53 therms by about 6 cents, and increases the average commercial rates schedule 3 by about 21 cents. This is because the temporary adjustments in rates were a slight credit.

The balance in the SIP cost of service reserve account has been transferred to a residual account for amortization under Schedule 178 (see OPUC Advice 15-08).

The number of customers affected by the proposed changes described above is 572,721 residential customers, 58,300 commercial customers, and 805 industrial customers.

This filing is made in accordance with ORS 757.210 which authorizes changes to an existing rate or schedule of rates to the extent authorized by the Commission, and with OPUC Order Nos. 09-067 and 13-179 in Docket 1406.

In addition to the supporting materials submitted as part of this filing, the Company separately provided workpapers in electronic format, all of which are incorporated herein by reference.

The Company requests that the tariff sheets filed herewith be permitted to become effective with service on and after November 1, 2015.

Copies of this letter and the filing made herewith are available in the Company's main office in Oregon and on its website at <u>www.nwnatural.com</u>.

The Company waives paper service in this proceeding. Please address correspondence on this matter to Andrew Speer at Andrew.Speer@nwnatural.com, with copies to the following:

Public Utility Commission of Oregon UG ____; NWN Advice No. OPUC 15-10 July 31, 2015, Page 3

> eFiling Rates & Regulatory Affairs NW Natural 220 NW Second Avenue Portland, Oregon 97209 Telecopier: (503) 721-2516 Telephone: (503) 226-4211, x3589 eFiling@nwnatural.com

Sincerely,

/s/ Onita R. King

Onita R. King NW Natural

Attachments: Exhibit A – Supporting Materials

P.U.C. Or. 25

SCHEDULE 177 SYSTEM INTEGRITY PROGRAM (SIP) RECOVERY MECHANISM

(continued)

APPLICATION TO RATE SCHEDULES:

Effective: November 1, 2015

The Adjustments shown below are included in the Base Adjustments in the listed Rate Schedules:

| Schedule | Block | lock Part A | | Part B | Part C | Total Adjustment |
|----------|---------|-------------|-----------|-----------|-----------|---------------------|
| | | 70% | 30% | | | |
| | | | | | | |
| 2 | | \$0.00375 | \$0.00166 | \$0.00000 | \$0.00000 | \$0.00541 |
| 3 (CSF) | | \$0.00375 | \$0.00117 | \$0.00000 | \$0.00000 | \$0.00492 |
| 3 (ISF) | | \$0.00000 | \$0.00099 | \$0.00000 | \$0.00000 | \$0.00099 |
| 27 | | \$0.00375 | \$0.00138 | \$0.00000 | \$0.00000 | \$0.00513 |
| 31 (CSF) | Block 1 | \$0.00375 | \$0.00088 | \$0.00000 | \$0.00000 | \$0.00463 |
| | Block 2 | \$0.00375 | \$0.00080 | \$0.00000 | \$0.00000 | \$0.00455 |
| 31(CTF) | Block 1 | \$0.00375 | \$0.00106 | \$0.00000 | \$0.00000 | \$0.00481 |
| | Block 2 | \$0.00375 | \$0.00097 | \$0.00000 | \$0.00000 | \$0.00472 |
| 31 (ISF) | Block 1 | \$0.00000 | \$0.00064 | \$0.00000 | \$0.00000 | \$0.00064 |
| | Block 2 | \$0.00000 | \$0.00058 | \$0.00000 | \$0.00000 | \$0.00058 |
| 31 (IFT) | Block 1 | \$0.00000 | \$0.00065 | \$0.00000 | \$0.00000 | \$0.00065 |
| | Block 2 | \$0.00000 | \$0.00059 | \$0.00000 | \$0.00000 | \$0.00059 |
| 32 (CSF) | Block 1 | \$0.00000 | \$0.00051 | \$0.00000 | \$0.00000 | \$0.00051 |
| | Block 2 | \$0.00000 | \$0.00043 | \$0.00000 | \$0.00000 | \$0.00043 |
| | Block 3 | \$0.00000 | \$0.00031 | \$0.00000 | \$0.00000 | \$0.00031 |
| | Block 4 | \$0.00000 | \$0.00018 | \$0.00000 | \$0.00000 | \$0.00018 |
| | Block 5 | \$0.00000 | \$0.00010 | \$0.00000 | \$0.00000 | \$0.00010 |
| | Block 6 | \$0.00000 | \$0.00005 | \$0.00000 | \$0.00000 | \$0.00005 |
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(continue to Sheet 177-4)

Issued July 31, 2015 NWN OPUC Advice No. 15-10 Effective with service on and after November 1, 2015

P.U.C. Or. 25

Third Revision of Sheet 177-4 Cancels Second Revision of Sheet 177-4

SCHEDULE 177 SYSTEM INTEGRITY PROGRAM (SIP) RECOVERY MECHANISM

(continued)

APPLICATION TO RATE SCHEDULES:

Effective: November 1, 2015

The Adjustments shown below are included in the Base Adjustments in the listed Rate Schedules:

| Schedule | Block | Block Part A | | Part B | Part C | Total Adjustment |
|----------|---------|--------------|-----------|-----------|-----------|---------------------|
| | | 70% | 30% | | | |
| 32 (ISF) | Block 1 | \$0.00000 | \$0.00038 | \$0.00000 | \$0.00000 | \$0.00038 |
| · · · | Block 2 | \$0.00000 | \$0.00032 | \$0.00000 | \$0.00000 | \$0.00032 |
| | Block 3 | \$0.00000 | \$0.00023 | \$0.00000 | \$0.00000 | \$0.00023 |
| | Block 4 | \$0.00000 | \$0.00013 | \$0.00000 | \$0.00000 | \$0.00013 |
| | Block 5 | \$0.00000 | \$0.00008 | \$0.00000 | \$0.00000 | \$0.00008 |
| | Block 6 | \$0.00000 | \$0.00004 | \$0.00000 | \$0.00000 | \$0.00004 |
| 32 (TF) | Block 1 | \$0.00000 | \$0.00036 | \$0.00000 | \$0.00000 | \$0.00036 |
| | Block 2 | \$0.00000 | \$0.00030 | \$0.00000 | \$0.00000 | \$0.00030 |
| | Block 3 | \$0.00000 | \$0.00021 | \$0.00000 | \$0.00000 | \$0.00021 |
| | Block 4 | \$0.00000 | \$0.00012 | \$0.00000 | \$0.00000 | \$0.00012 |
| | Block 5 | \$0.00000 | \$0.00007 | \$0.00000 | \$0.00000 | \$0.00007 |
| | Block 6 | \$0.00000 | \$0.00004 | \$0.00000 | \$0.00000 | \$0.00004 |
| 32 (CSI) | Block 1 | \$0.00000 | \$0.00037 | \$0.00000 | \$0.00000 | \$0.00037 |
| | Block 2 | \$0.00000 | \$0.00031 | \$0.00000 | \$0.00000 | \$0.00031 |
| | Block 3 | \$0.00000 | \$0.00022 | \$0.00000 | \$0.00000 | \$0.00022 |
| | Block 4 | \$0.00000 | \$0.00013 | \$0.00000 | \$0.00000 | \$0.00013 |
| | Block 5 | \$0.00000 | \$0.00007 | \$0.00000 | \$0.00000 | \$0.00007 |
| | Block 6 | \$0.00000 | \$0.00004 | \$0.00000 | \$0.00000 | \$0.00004 |
| 32 (ISI) | Block 1 | \$0.00000 | \$0.00035 | \$0.00000 | \$0.00000 | \$0.00035 |
| | Block 2 | \$0.00000 | \$0.00030 | \$0.00000 | \$0.00000 | \$0.00030 |
| | Block 3 | \$0.00000 | \$0.00021 | \$0.00000 | \$0.00000 | \$0.00021 |
| | Block 4 | \$0.00000 | \$0.00012 | \$0.00000 | \$0.00000 | \$0.00012 |
| | Block 5 | \$0.00000 | \$0.00007 | \$0.00000 | \$0.00000 | \$0.00007 |
| | Block 6 | \$0.00000 | \$0.00004 | \$0.00000 | \$0.00000 | \$0.00004 |
| 32 (TI) | Block 1 | \$0.00000 | \$0.00032 | \$0.00000 | \$0.00000 | \$0.00032 |
| | Block 2 | \$0.00000 | \$0.00027 | \$0.00000 | \$0.00000 | \$0.00027 |
| | Block 3 | \$0.00000 | \$0.00019 | \$0.00000 | \$0.00000 | \$0.00019 |
| | Block 4 | \$0.00000 | \$0.00011 | \$0.00000 | \$0.00000 | \$0.00011 |
| | Block 5 | \$0.00000 | \$0.00006 | \$0.00000 | \$0.00000 | \$0.00006 |
| | Block 6 | \$0.00000 | \$0.00003 | \$0.00000 | \$0.00000 | \$0.00003 |
| 33 (all) | | \$0.00000 | \$0.00002 | \$0.00000 | \$0.00000 | \$0.00002 |

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(continue to Sheet 177-5)

Issued July 31, 2015 NWN OPUC Advice No. 15-10 Effective with service on and after November 1, 2015

P.U.C. Or. 25

SCHEDULE 177 SYSTEM INTEGRITY PROGRAM (SIP) RECOVERY MECHANISM (continued)

APPLICATION TO RATE SCHEDULES:

Effective: November 1, 2015

The Adjustments shown below reflect a credit to customer rates associated with a cost of service reserve relating to the 2013-2014 PGA Year. The Adjustments shown below are included in the Temporary Adjustments in the listed Rate Schedules:

| Schedule | Block | Part A | Part A | | Total Adjustment |
|----------|---------|-----------|-----------|-----------|---------------------|
| | | 70% | 30% | | |
| | | | | | |
| 2 | | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 3 (CSF) | | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 3 (ISF) | | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 27 | | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 31 (CSF) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 31(CTF) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 31 (ISF) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 31 (IFT) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 32 (CSF) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 3 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 4 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 5 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 6 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
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(continue to Sheet 177-6)

Issued July 31, 2015 NWN OPUC Advice No. 15-10 Effective with service on and after November 1, 2015

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

SCHEDULE 177 SYSTEM INTEGRITY PROGRAM (SIP) RECOVERY MECHANISM

(continued)

APPLICATION TO RATE SCHEDULES:

Effective: November 1, 2015

The Adjustments shown below are included in the Base Adjustments in the listed Rate Schedules:

| Schedule | Block | Pai | rt A | Part B | Total Adjustment |
|----------|---------|-----------|-----------|-----------|---------------------|
| | | 70% | 30% | | |
| 32 (ISF) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 3 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 4 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 5 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 6 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 32 (TF) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 3 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 4 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 5 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 6 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 32 (CSI) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 3 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 4 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 5 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 6 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 32 (ISI) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 3 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 4 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 5 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 6 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 32 (TI) | Block 1 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| · | Block 2 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 3 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 4 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 5 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| | Block 6 | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |
| 33 (all) | | \$0.00000 | \$0.00000 | \$0.00000 | \$0.00000 |

Issued July 31, 2015 NWN OPUC Advice No. 15-10 Effective with service on and after November 1, 2015

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EXHIBIT A

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

NW NATURAL SUPPORTING MATERIALS

Non-Gas Cost Deferral Amortizations UM 1406 System Integrity Program

NWN OPUC Advice No. 15-10 / UG _____

July 31, 2015

NW NATURAL

EXHIBIT A

Supporting Material

Non-Gas Cost Deferral Amortizations - UM 1406

System Integrity Program

NWN OPUC ADVICE NO. 15-10/ UG _____

| Description | Page |
|---|------|
| Calculation of Increments Allocated on the Equal Percentage of Margin Basis | 1 |
| Calculations of Increments Allocated on the Equal Cent Per Therm Basis | 2 |
| PGA Effects on Revenue | 3 |
| Cost of Service Summary | 4 |
| Safety Program Workpaper – Bare Steel/Leakage | 5 |

| | | Oregon PGA | Billing Rate from | c | Temps from Temporary | | | | | | Proposed Amount: | SIP: Ba 905,099 PEI | SIP: Bare Steel - 30% 905,099 PERMANENT Increment | nent |
|---------------------------|--------------------|---------------------------|-------------------------|------------------------------|-----------------------------|--------------------|----------------------|---|--------------|-----------------|--|-------------------------------|--|-------------------------|
| | | Volumes page, Column F | Rates page, Column A | Rates page, Column B+C+D* | Increment page, Column A | MARGIN Rate | Volumetric Margin | Customer Charge | Customers | Total Margin | Revenue Sensitive Multiplier: Amount to Amortize: | 905,099 to a | rev sensitive factor is built in to all classes and schedules | is built in chedules |
| | ' . ; | . | | | | E=B-C-D | | | : | , | | | Allocation to RS Increment | ncrement |
| Schedule | Block | 245 285 206 | B 1 01320 | C 65622 | D 0.0381 | E 0 43327 | F = E * A | ۵ م | H 571 204 | 1 312 102 748 | | Σ ; | ADE 200 | 0 00166 |
| 3C Firm Sales | | 158,936,755 | 0.95518 | 0.55622 | 0.05288 | 0.34608 | 55,004,832 | \$15.00 | | 65,251,872 | | 1.0 | 185,342 | 0.00117 |
| 31 Firm Sales | | 3,811,735 | 0.93199 | 0.55622 | 0.03900 | 0.33677 | 1,283,678 | \$15.00 | 278 | 1,333,718 | | 1.0 | 3,788 | 0.00099 |
| 27 Dry Out | | 700,552 | 0.90927 | 0.55622 | 0.02332 | 0.32973 | 230,993 | \$6.00 | 1,517 | 340,217 | | 1.0 | 966 | 0.00138 |
| 31C Firm Sales | Block 1 Block 2 | 20,701,736 15 317 497 | 0.69453 | 0.43383 0.43383 | 0.05295 0.05298 | 0.20775 0.18981 | 7,208,200 | \$325.00 | 903 | 10,729,900 | | 0.0 | 30,477 | 0.00088 |
| 31C Firm Trans | Block 1 | 1,022,480 | 0.17309 | 0.0000 | (0.00072) | 0.17381 | 374,420 | \$575.00 | 62 | 802,220 | | 1.0 | 2,279 | 0.00106 |
| 241 Firm Color | Block 2 | 1,238,213 | 0.15815 | 0.00000 | (0.00071) | 0.15886 | 0110010 | 00 1000 | 001 | 0 / L 10 0 | | 1.0 | 1010 | 0.00097 |
| 311 FIFM Sales | Block 1 Block 2 | 4,1/8,853 9,536,789 | 0.63779 | 0.43383 0.43383 | 0.03909 0.03911 | 0.16487 0.14897 | 2,109,663 | \$325.00 | 661 | 2,885,763 | | 1.0 | 8,197 | 0.00058 |
| 311 Firm Trans | Block 1 Block 2 | 181,494 680.650 | 0.15988 0.14450 | 0.00000 | (0.00002) (0.00001) | 0.15990 | 127,382 | \$575.00 | 8 | 182,582 | | 1.0 | 519 | 0.00065 |
| 32C Firm Sales | Block 1 | 26,567,626 | 0.56907 | 0.43383 | 0.03903 | 0.09621 | 3,242,704 | \$675.00 | 346 | 6,045,304 | | 1.0 | 17,171 | 0.00051 |
| | Block 2 Block 3 | 7,804,067 829.092 | 0.55465 | 0.43383 0.43383 | 0.03906 | 0.08176 | | | | | | 0.0 | | 0.00043 |
| | Block 4 | 20,793 | 0.50663 | 0.43383 | 0.03911 | 0.03369 | | | | | | 1.0 | | 0.00018 |
| | Block 5 Block 4 | 0 0 | 0.49221 | 0.43383 | 0.03912 | 0.01926 | | | | | | 1.0 | | 0.00010 |
| 321 Firm Sales | Block 1 | 4,645,409 | 0.56814 | 0.43383 | 0.03916 | 0.09515 | 983,960 | \$675.00 | 48 | 1,372,760 | | 1.0 | 3,899 | 0.00038 |
| | Block 2 | 5,152,955 | 0.55389 | 0.43383 | 0.03918 | 0.08088 | | | | | | 1.0 | | 0.00032 |
| | Block 3 Block 4 | 1,826,257 627,963 | 0.53013 0.50636 | 0.43383 0.43383 | 0.03927 | 0.05/09 0.03331 | | | | | | 0.0 | | 0.00023 |
| | Block 5 | (0) | 0.49210 | 0.43383 | 0.03925 | 0.01902 | | | | | | 1.0 | | 0.00008 |
| 32 Firm Trans | Block 6 Block 1 | 0 12 006 597 | 0.48263 | 0.43383 | 0.03924 | 00000 | 3 960 067 | \$925.00 | 116 | 5 247 667 | | 0.1 | 14 906 | 0.00036 |
| | Block 2 | 16,315,496 | 0.08064 | 0.00000 | 0.00004 | 0.08060 | | | | - | | 1.0 | | 0.00030 |
| | Block 3 | 9,641,378 16 134 178 | 0.05697 | 0.00000 | 0.00006 | 0.05691 | | | | | | 0.0 | | 0.00021 |
| | Block 5 | 21,282,059 | 0.01906 | 0.0000 | 0.00009 | 0.01897 | | | | | | 1.0 | | 0.00007 |
| | Block 6 | 1,920,752 | 0.00959 | 0.00000 | 0.00008 | 0.00951 | 0.00 | 00 1014 | 3 | | | 1.0 | 0 | 0.00004 |
| 320 Interf Sales | Block 1 Block 2 | 5,686,222 7,563,208 | 0.56339 | 0.43383 0.43383 | 0.04615 0.04615 | 0.09811 0.08341 | 1,5/2,249 | 00.6/9\$ | 1.9 | 2,066,349 | | 0.1 | 5,869 | 0.00031 |
| | Block 3 | 3,897,038 | 0.53889 | 0.43383 | 0.04619 | 0.05887 | | | | | | 1.0 | | 0.00022 |
| | Block 4 Block 5 | 4,445,365 71 870 | 0.51438 0.49967 | 0.43383 0.43383 | 0.04620 0.04623 | 0.03435 | | | | | | 0.0 | | 0.000073 |
| | Block 6 | 0 | 0.48989 | 0.43383 | 0.04622 | 0.00984 | | | | | | 1.0 | | 0.00004 |
| 321 Interr Sales | Block 1 | 7,186,289 | 0.57815 | 0.43383 | 0.04626 | 0.09806 | 2,201,208 | \$675.00 | 71 | 2,776,308 | | 0.0 | 7,886 | 0.00035 |
| | Block 3 | 5,135,755 | 0.53895 | 0.43383 | 0.04629 | 0.05883 | | | | | | 0.1 | | 0.00021 |
| | Block 4 | 10,445,179 | 0.51445 | 0.43383 | 0.04630 | 0.03432 | | | | | | 1.0 | | 0.00012 |
| | Block 5 Block 6 | 4,597,392 1 | 0.4997 | 0.43383 0.43383 | 0.04633 0.04632 | 0.01961 | | | | | | 0.1 | | 0.0000/0 |
| 32 Interr Trans | Block 1 | 8,779,332 | 0.09620 | 0.00000 | 0.00004 | 0.09616 | 5,569,605 | \$925.00 | 85 | 6,513,105 | | 1.0 | 18,500 | 0.00032 |
| | Block 2 | 15,689,249 | 0.08179 | 0.00000 | 0.00005 | 0.08174 | | | | | | 1.0 | | 0.00027 |
| | Block 3 Block 4 | 28,429,084 | 0.03373 | 0,00000 | 0.00007 | 0.03366 | | | | | | 0.0 | | 0.00017 |
| | Block 5 | 56,035,539 | 0.01933 | 0.00000 | 0.00009 | 0.01924 | | | | | | 1.0 | | 0.00006 |
| 33 | Block 6 | 78,278,646 0 | 0.00975 | 0.00000 | 0.00010 | 0.00965 | C | \$38 000 00 | C | C | | 1.0 | C | 0.00003 |
| 0.1446.04 | | | | | | | | 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 | | | | | | |
| IUIALS | | 989'668'796 | | | | | 242,130,125 | | | 516,060,815 | | 510,000,815 | 660'G06 | |
| Sources for line 2 above: | above: | | | | | | | | | | | 100 JE | | |
| afed shullin | | | | | | | | | | | | | | |
| Tariff Schedules | | | | | | | | | | | | | | |
| Rate Adjustment | Schedule | | | | | | | | | | | | | |

NW Natural Rates & Regulatory Affairs 2015-16 PGA - Oregon: August Filing Calculation of Increments Allocated on the EQUAL CENT PER THERM BASIS

| ALL VOLUM | ES IN T | HERMS |
|-----------|---------|-------|
|-----------|---------|-------|

| Block | Oregon PGA Volumes page, Column F | Proposed Amount: Revenue Sensitive Multiplier: | 2,111,897 N/A | PERMANENT In | |
|--------------------|---|---|--|--|--|
| Block | | Revenue sensitive Multiplier: | IN/A | | stor is built in |
| Block | Column F | Annual to Annual the s | 0.444.007 | | |
| Block | | Amount to Amortize: | 2,111,897 | to res. & comm. f | |
| DIUCK | Α | | Multiplier Z | Volumes AA | Increment AB |
| | 365,285,306 | | 1.0 | 365,285,306 | 0.00375 |
| | 158,936,755 | - | 1.0 | 158,936,755 | 0.00375 |
| | 3,811,735 | - | 0.0 | 138,930,735 | 0.00000 |
| | 700,552 | - | 1.0 | 700,552 | 0.00000 |
| Block 1 | 20,701,736 | - | 1.0 | 20,701,736 | 0.00375 |
| Block 2 | 15,317,497 | | 1.0 | 15,317,497 | 0.00375 |
| Block 2 | 1,022,480 | - | 1.0 | 1,022,480 | 0.00375 |
| Block 2 | 1,238,213 | | 1.0 | 1,238,213 | 0.00375 |
| Block 2 Block 1 | 4,178,853 | - | 0.0 | 1,236,213 | 0.00000 |
| Block 2 | 9,536,789 | | 0.0 | 0 | 0.00000 |
| Block 2 Block 1 | 181,494 | - | 0.0 | 0 | 0.00000 |
| Block 2 | | | 0.0 | 0 | 0.00000 |
| Block 2 | 680,650 | - | 0.0 | 0 | |
| | 26,567,626 | | | | 0.00000 |
| Block 2 | 7,804,067 | | 0.0 | 0 | 0.0000 |
| Block 3 | 829,092 20,793 | | 0.0 0.0 | 0 0 | 0.0000 |
| Block 4 | | | | | 0.0000 |
| Block 5 | 0 | | 0.0 | 0 | 0.00000 |
| Block 6 | 0 | - | 0.0 | 0 | 0.0000 |
| Block 1 | 4,645,409 | | 0.0 | 0 | 0.00000 |
| Block 2 | 5,152,955 | | 0.0 | 0 | 0.00000 |
| Block 3 | 1,826,257 | | 0.0 | 0 | 0.0000 |
| Block 4 | 627,963 | | 0.0 | 0 | 0.0000 |
| Block 5 | (0) | | 0.0 | 0 | 0.00000 |
| Block 6 | 0 | - | 0.0 | 0 | 0.00000 |
| Block 1 | 12,006,597 | | 0.0 | 0 | 0.00000 |
| Block 2 | 16,315,496 | | 0.0 | 0 | 0.00000 |
| Block 3 | 9,641,378 | | 0.0 | 0 | 0.00000 |
| Block 4 | 16,134,178 | | 0.0 | 0 | 0.0000 |
| Block 5 | 21,282,059 | | 0.0 | 0 | 0.0000 |
| Block 6 | 1,920,752 | _ | 0.0 | 0 | 0.0000 |
| Block 1 | 5,686,222 | | 0.0 | 0 | 0.0000 |
| | | | | | 0.0000 |
| Block 3 | | | | | 0.0000 |
| | | | | | 0.0000 |
| Block 5 | | | | | 0.0000 |
| Block 6 | | | | | 0.0000 |
| Block 1 | | | | | 0.0000 |
| Block 2 | 8,946,142 | | 0.0 | 0 | 0.0000 |
| Block 3 | | | 0.0 | 0 | 0.0000 |
| Block 4 | 10,445,179 | | 0.0 | 0 | 0.00000 |
| Block 5 | 4,597,392 | | 0.0 | 0 | 0.00000 |
| Block 6 | 1 | | 0.0 | 0 | 0.0000 |
| Block 1 | | | 0.0 | 0 | 0.0000 |
| Block 2 | 15,689,249 | | 0.0 | 0 | 0.0000 |
| Block 3 | 11,306,695 | | 0.0 | 0 | 0.0000 |
| Block 4 | 28,429,084 | | 0.0 | 0 | 0.0000 |
| Block 5 | 56,035,539 | | 0.0 | 0 | 0.0000 |
| Block 6 | 78,278,646 | | 0.0 | 0 | 0.0000 |
| | 0 | | 0.0 | 0 | 0.00000 |
| | | | | | |
| | 962,859,686 | | | 563,202,538 | 0.00375 |
| | | | | | |
| ove: | | | | | |
| | | | Line 33 | | |
| | | | | | |
| | | | | | |
| | Block 2 Block 3 Block 4 Block 5 Block 1 Block 5 Block 4 Block 5 Block 1 Block 2 Block 3 Block 4 Block 5 Block 5 Block 5 Block 5 Block 5 Block 6 Block 5 Block 6 Block 5 Block 6 Block 6 | Block 2 7,563,208 Block 3 3,897,038 Block 4 4,445,365 Block 5 71,870 Block 6 0 Block 1 7,186,289 Block 2 8,946,142 Block 3 5,135,755 Block 4 10,445,179 Block 5 4,597,392 Block 6 1 Block 1 8,779,332 Block 2 15,689,249 Block 3 11,306,695 Block 5 56,035,539 Block 6 78,278,646 0 962,859,686 | Block 2 7,563,208 Block 3 3,897,038 Block 4 4,445,365 Block 5 71,870 Block 6 0 Block 1 7,186,289 Block 2 8,946,142 Block 3 5,135,755 Block 4 10,445,179 Block 5 4,597,392 Block 6 1 Block 1 8,779,332 Block 2 15,689,249 Block 3 11,306,695 Block 4 28,429,084 Block 5 56,035,539 Block 6 78,278,646 0 0 | Block 2 7,563,208 0.0 Block 3 3,897,038 0.0 Block 4 4,445,365 0.0 Block 5 71,870 0.0 Block 6 0 0.0 Block 1 7,186,289 0.0 Block 2 8,946,142 0.0 Block 3 5,135,755 0.0 Block 4 10,445,179 0.0 Block 5 4,597,392 0.0 Block 6 1 0.0 Block 1 8,779,332 0.0 Block 2 15,689,249 0.0 Block 3 11,306,695 0.0 Block 4 28,429,084 0.0 Block 5 56,035,539 0.0 Block 6 78,278,646 0.0 0 0 0.0 962,859,686 0.0 0.0 | Block 2 7,563,208 0.0 0 Block 3 3,897,038 0.0 0 Block 4 4,445,365 0.0 0 Block 5 71,870 0.0 0 Block 6 0 0.0 0 Block 1 7,186,289 0.0 0 Block 2 8,946,142 0.0 0 Block 3 5,135,755 0.0 0 Block 4 10,445,179 0.0 0 Block 5 4,597,392 0.0 0 Block 4 10,445,179 0.0 0 Block 5 4,597,392 0.0 0 Block 4 11,306,695 0.0 0 Block 3 11,306,695 0.0 0 Block 5 56,035,539 0.0 0 Block 6 78,278,646 0.0 0 0 0 0.0 0 962,859,686 563,202,538 |

PGA Effects on Revenue Tariff Advice 15-10: SIP

| 1 | | Including Revenue Sensitve <u>Amount</u> |
|----|--|--|
| 2 | | |
| 3 | Permanent Rate Adjustments | |
| 4 | | |
| 5 | SIP Program Costs | |
| 6 | Addition of Proposed Bare Steel Program Costs | 3,016,996 |
| 7 | | |
| 8 | Removal of Current Bare Steel Program Costs | (2,434,719) |
| 9 | | |
| 10 | | 582,277 |
| 11 | | |
| 12 | | |
| 13 | | |
| 14 | 2014 Oregon Earnings Test Normalized Total Revenues | \$678,848,000 |
| 15 | | |
| 16 | Effect of this filing, as a percentage change (line 9 ÷ line 14) | 0.09% |

NW Natural System Integrity Program Cost Tracking Cost of Service Summary - 2015-16 PGA: August filing

| in Th | ousands of Dollars | Investment | Tracker Year Cost of Service |
|-------|---------------------------------|------------|---------------------------------|
| 1 | Bare Steel Program | | |
| 2 | | | |
| 3 | Activity Ended October 31, 2013 | \$7,529 | \$971 |
| 4 | | | |
| 5 | Activity Ended October 31, 2014 | \$9,221 | \$1,226 |
| 6 | | | |
| 7 | Activity Ended October 31, 2015 | \$5,284 | \$820 |
| 8 | | | |
| 9 | Total Bare Steel Program | \$22,034 | \$3,017 |
| 10 | | | |
| 11 | | | |

12 Reflects Actuals through June 30, 2015

NW Natural Rates & Regulatory Affairs 2015-2016 PGA Filing - Oregon: August Filing Safety Program Workpaper - Bare Steel/Leakage

Bare Steel & Leakage Summary

| | | (a) | (b) | (c) | (d) = (a) + (b) - (c) |
|----|--|------------------|------------|-----------------|-----------------------|
| | Investment per Engineering by Program Year: | <u>Leakage</u> | Bare Steel | first \$4MM=NWN | <u>Total</u> |
| | Nov 12 - Oct 13 | 1,439,424 | 13,053,971 | 4,000,000 | 10,493,395 |
| 1 | Nov 13 - Oct 14 | 2,186,658 | 11,034,242 | 4,000,000 | 9,220,900 |
| 2 | Nov 14 - Oct 15 | 2,879,282 | 5,404,483 | 3,000,000 | 5,283,764 |
| 3 | | | | | |
| 4 | Project to Date Investment | 6,505,364 | 29,492,696 | 11,000,000 | 24,998,060 |
| 5 | | | | | |
| 6 | Reductions by Program Year: | | | | |
| 7 | Agreed to Audit Adjustments: | | | | |
| 8 | Audit of 2013 completed in 2014 | | | | 0 |
| 9 | Audit of 2014 completed in 2015 | | | | 0 |
| 10 | Audit of 2015 completed in 2016 | | | | 0 |
| 11 | Subtotal audit adjustments | | | | 0 |
| 12 | | | | | |
| 13 | | | | | |
| 14 | Project to Date Investment Net of Audit Adjustme | nts | | | 24,998,060 |
| 15 | | | | | |
| 16 | Investment Amounts Included in Prior PGA Filings | s (by PGA Year): | | | |
| 17 | Nov 13 - Oct 14 | | | | 10,493,395 |
| 18 | Nov 14 - Oct 15 | | | | 9,220,900 |
| 19 | Nov 15 - Oct 16 | | | - | 0 |
| 20 | Subtotal | | | | 19,714,295 |
| 21 | | | | | |
| 22 | Net Investment to Include in Rates | | | - | 5,283,765 |
| 23 | | | | | |

24

Program year lags the PGA year by 1 year. For example, in the 2015-16 PGA you would expect to see costs from Nov 14-Oct 15