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



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503.226.4211

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August 1, 2014

NWN OPUC Advice No. 14-12 / UG ______ (UP 280; UP 287; UP 290)

VIA ELECTRONIC FILING

Public Utility Commission of Oregon 3930 Fairview Industrial Drive SE Post Office Box 1088 Salem, Oregon 97308-1088

Attn: Filing Center

Re: REQUEST FOR AMORTIZATION OF CERTAIN NON-GAS COST DEFERRED ACCOUNTS RELATING TO:

UP 280: Sale of South Center Property UP 287: Sale of Tualatin Property UP 290: Sale of Central Property

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company"), files herewith revisions to its Tariff, P.U.C. Or. 24, stated to become effective with service on and after November 1, 2014, as follows:

Second Revision of Sheet 178-1, Schedule 178, "Regulatory Rate Adjustment"; and

Second Revision Sheet 178-2, Schedule 178, "Regulatory Rate Adjustment (continued)."

The purpose of this filing is to request amortization of amounts under Docket UP 280, UP 287, and UP 290 for inclusion in rates effective November 1, 2014. The Company last adjusted rates for this purpose effective November 1, 2013.

The net effect of removing the temporary adjustment applied to rates effective November 1, 2013 and the application of the new temporary adjustment is to increase the Company's annual revenues by \$3,901,563, or about 0.58%.

The monthly bill of the average residential customer served under Rate Schedule 2 using 53 therms will increase by about \$0.39. The monthly increase for the average commercial Rate Schedule 3 customer using 232 therms per month is about \$1.20, and the monthly increase for the average industrial Schedule 32 firm sales customer using 19,285 therms is about \$30.66. Public Utility Commission of Oregon UG ____; NWN OPUC Advice No. 14-12 August 1, 2014, Page 2

Because the rate adjustments are calculated on an equal-percentage-ofmargin basis, the proposed adjustments vary by rate block and as such are too numerous to list here. A worksheet showing all of the rate adjustments can be found in Exhibit A to this filing.

The number of customers affected by the proposed change is 563,128 residential customers, 59,508 commercial customers, and 825 industrial customers.

This filing is in compliance with ORS 757.259 (2003), which authorizes deferred utility expenses or revenues to be allowed (amortized) in rates to the extent authorized by the Commission in a proceeding to change rates. All of the deferrals included in this filing occurred with appropriate application by Commission authorization, as rate orders or under approved tariffs.

For the purpose of recovering deferred balances as outlined in ORS 757.259, the required earnings review covering the period(s) during which the deferrals in this filing occurred was performed with Staff's review of the 2014 Annual Results of Operations review.

In addition to the supporting materials submitted as part of this filing, the Company will separately submit work papers 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, 2014.

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 me at ork@nwnatural.com, with copies to the following:

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 Cristan Kelley, Rate Analyst Rates & Regulatory Affairs NW Natural 220 NW Second Avenue Portland, Oregon 29709 Telecopier: (503) 721-2516 Telephone: (503) 226-4211, x3582 cristan.kelley@nwnatural.com

Sincerely,

NW NATURAL

/s/ Onita R. King

Onita R. King Rates & Regulatory Affairs

Attachments: Exhibit A – Supporting Materials

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

SCHEDULE 178 REGULATORY RATE ADJUSTMENT

PURPOSE:

To reflect the effects of various regulatory adjustments including costs associated with Commission fee and other miscellaneous non-reoccurring costs or credits.

APPLICABLE:

To the following Rate Schedules of this Tariff:

Rate Schedule 2	Rate Schedule 27	Rate Schedule 32
Rate Schedule 3	Rate Schedule 31	Rate Schedule 33

GENERAL TERMS:

This Schedule is governed by the terms of this Schedule, the General Rules and Regulations contained in this Tariff, any other schedules that by their terms or by the terms of this Schedule apply to service under this Schedule and by all rules and regulations prescribed by regulatory authorities, as amended from time to time.

DESCRIPTION:

The Total Adjustment is the net adjustment for the following:

Net Gain on Sale of Properties:

UP 280: Sale of South Center Property UP 287: Sale of Tualatin Property UP 290: Sale of Central Property

TERM:

This adjustment rate shall be in effect through October 31, 2015, or such other date as the Commission may approve.

APPLICATION TO RATE SCHEDULES:

The Total Adjustment amount shown below is included in the Temporary Adjustments reflected in the above-listed Rate Schedules. NO ADDITIONAL ADJUSTMENT TO RATES IS REQUIRED.

Schedule	Block	Total Adjustment
2		\$0.00018
3 CSF		\$0.00013
3 ISF		\$0.00011
27		\$0.00015
31 CSF	Block 1	\$0.00009
	Block 2	\$0.00009
31 CTF	Block 1	\$0.00010
	Block 2	\$0.00009

(continue to Sheet 178-2)

Issued August 1, 2014 NWN OPUC Advice No. 14-12 Effective with service on and after November 1, 2014

Effective: November 1, 2014 (T)



P.U.C. Or. 25

SCHEDULE 178 REGULATORY RATE ADJUSTMENT

(continued)

APPLICATION TO RATE SCHEDULES:

Effective: November 1, 2014 (T)

(C)

(C)

The Total Adjustment amount shown below is included in the Temporary Adjustments reflected in the above-listed Rate Schedules. NO ADDITIONAL ADJUSTMENT TO RATES IS REQUIRED.

Schedule	Block	Total Adjustment
31 ISF	Block 1	\$0.00007
	Block 2	\$0.00006
31 ITF	Block 1	\$0.00007
	Block 2	\$0.00006
32 CSF	Block 1	\$0.00006
	Block 2	\$0.00005
	Block 3	\$0.00003
	Block 4	\$0.00002
	Block 5	\$0.00001
	Block 6	\$0.00001
32 ISF	Block 1	\$0.00004
	Block 2	\$0.00004
	Block 3	\$0.00003
	Block 4	\$0.00001
	Block 5	\$0.00001
	Block 6	\$0.00000
32 CTF/ITF	Block 1	\$0.00004
	Block 2	\$0.00003
	Block 3	\$0.00002
	Block 4	\$0.00001
	Block 5	\$0.00001
	Block 6	\$0.00000
32 CSI	Block 1	\$0.00004
	Block 2	\$0.00003
	Block 3	\$0.00002
	Block 4	\$0.00001
	Block 5	\$0.00001
	Block 6	\$0.00000
32 ISI	Block 1	\$0.00004
	Block 2	\$0.00003
	Block 3	\$0.00002
	Block 4	\$0.00001
	Block 5	\$0.00001
	Block 6	\$0.00000
32 CTI/ITI	Block 1	\$0.00004
	Block 2	\$0.00003
	Block 3	\$0.00002
	Block 4	\$0.00001
	Block 5	\$0.00001
	Block 6	\$0.00000
33 (all)		\$0.00000

Issued August 1, 2014 NWN OPUC Advice No. 14-12 Effective with service on and after November 1, 2014

EXHIBIT A

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

NW NATURAL SUPPORTING MATERIALS

Non-Gas Cost Deferral Amortizations UP 280, 287 and 290 Property Sales and Residual Balance

NWN OPUC Advice No. 14-12 / UG _____ August 1, 2014



Exhibit A Supporting Materials Non-Gas Cost Deferral Amortization - UP 280, 287 and 290 Property Sales and Residual Balance NWN OPUC Advice No. 14-12 / UG ____

Page No.

Calculation of Increments Allocated on Equal Percentage of Margin	1
Basis for Revenue Related Costs	2
Summary of Deferred Account	3
254315 Amortization - Gains on Property Sales	4
Effects on Revenue	5

Exhibit A - Supporting Materials NWN OPUC Advice No. 14-12/UG _____ Page 1 of 5

NW Natural Rates & Regulatory Affairs 2014-15 PGA - Oregon: August Filing Calculation of Increments Allocated on the EQUAL PERCENTAGE OF MARGIN BASIS ALL VOLUMES IN THERMS

			Billing	WACOG &	Temps from								y Sales Amortiz	
		Oregon PGA	Rate from	Demand from	Temporary						Proposed Amount:		Temporary Incre	
		Volumes page,	Rates page,		Increment page,	MARGIN	Volumetric	Customer		Total	Revenue Sensitive Multiplier:		add revenue sen	
		Column F	Column A	Column B+C+D*	Column A	Rate	Margin	Charge	Customers	Margin	Amount to Amortize:		to all classes and	
Calcadada	B I 1	-	-	<u> </u>		E=B-C-D	**	c		T			Allocation to RS	
Schedule 2R	Block	A	B 0.99317	C	D 0.00870	E 0.43055	F = E * A 153,550,914	G \$8.00	H 563,128	207,611,202		<u>M</u> 1.0	N (5.154	0.0001
3C Firm Sales		356,638,984		0.55392				\$8.00				1.0	65,154	0.0001
3I Firm Sales		157,954,905 4,657,733	0.91427 0.89909	0.55392	0.01652	0.34383 0.33771	54,309,635 1,572,963	\$15.00	56,617 298	64,500,695 1,626,603		1.0	<u>20,242</u> 510	0.0001
27 Dry Out		796,593	0.89909	0.55392	(0.00768)	0.32777	261,099	\$6.00	1,525	370,899		1.0	116	0.0001
	Block 1	20,699,674	0.62962	0.40805	0.01583	0.20574	8,673,680	\$325.00	1,048	12,760,880		1.0	4,005	0.0001
51CTITITI Sales	Block 2	23,498,664	0.61164	0.40805	0.01505	0.18788	0,075,000	<i>4</i> 525.00	1,040	12,700,000		1.0	4,005	0.0000
31C Firm Trans	Block 1	388,881	0.16800	0.00000	(0.00385)	0.17185	152,526	\$575.00	18	276,726		1.0	87	0.0001
510 1 111 110115	Block 2	545,978	0.15344	0.00000	(0.00352)	0.15696	152,520	4575.00	10	2/0,/20		1.0	0,	0.0000
311 Firm Sales	Block 1	4,173,740	0.57905	0.40805	0.00674	0.16426	2,228,633	\$325.00	195	2,989,133		1.0	938	0.0000
511 Film Balco	Block 2	10,396,538	0.56309	0.40805	0.00662	0.14842	2/220/000	<i>4525100</i>	155	2,505,155		1.0	550	0.0000
31I Firm Trans	Block 1	165,160	0.15680	0.00000	(0.00251)	0.15931	142,637	\$575.00	8	197,837		1.0	62	0.0000
5111111111111	Block 2	807,983	0.14173	0.00000	(0.00224)	0.14397	112,007	4575100	Ū	157,007		1.0	02	0.0000
32C Firm Sales	Block 1	16,554,938	0.50956	0.40805	0.00582	0.09569	2,200,516	\$675.00	238	4,128,316		1.0	1,296	0.0000
	Block 2	6,660,345	0.49513	0.40805	0.00573	0.08135	_,,	+		.,,		1.0	_,	0.0000
	Block 3	1,153,455	0.47106	0.40805	0.00558	0.05743						1.0		0.0000
	Block 4	248,040	0.44698	0.40805	0.00542	0.03351						1.0		0.0000
	Block 5	0	0.43253	0.40805	0.00532	0.01916						1.0		0.0000
	Block 6	0	0.42290	0.40805	0.00526	0.00959						1.0		0.0000
32I Firm Sales	Block 1	4,334,225	0.50877	0.40805	0.00596	0.09476	945,329	\$675.00	51	1,358,429		1.0	426	0.0000
	Block 2	5,158,108	0.49449	0.40805	0.00589	0.08055						1.0		0.0000
	Block 3	1,793,731	0.47070	0.40805	0.00578	0.05687						1.0		0.0000
	Block 4	516,050	0.44689	0.40805	0.00566	0.03318						1.0		0.0000
	Block 5	. 0	0.43259	0.40805	0.00559	0.01895						1.0		0.0000
	Block 6	0	0.42311	0.40805	0.00554	0.00952						1.0		0.0000
32 Firm Trans	Block 1	11,412,253	0.09321	0.00000	(0.00130)	0.09451	3,840,737	\$925.00	110	5,061,737		1.0	1,589	0.0000
	Block 2	15,830,951	0.07925	0.00000	(0.00106)	0.08031						1.0		0.0000
	Block 3	9,285,426	0.05607	0.00000	(0.00066)	0.05673						1.0		0.0000
	Block 4	16,096,253	0.03282	0.00000	(0.00027)	0.03309						1.0		0.0000
	Block 5	21,498,809	0.01888	0.00000	(0.00003)	0.01891						1.0		0.0000
	Block 6	2,621,489	0.00961	0.00000	0.00013	0.00948						1.0		0.0000
32C Interr Sales	Block 1	6,122,694	0.51260	0.40805	0.00679	0.09776	1,723,155	\$675.00	62	2,225,355		1.0	698	0.0000
	Block 2	8,160,076	0.49787	0.40805	0.00672	0.08310						1.0		0.0000
	Block 3	4,328,184	0.47331	0.40805	0.00661	0.05865						1.0		0.0000
	Block 4	5,489,488	0.44878	0.40805	0.00650	0.03423						1.0		0.0000
	Block 5	242,825	0.43402	0.40805	0.00643	0.01954						1.0		0.0000
	Block 6	0	0.42426	0.40805	0.00640	0.00981						1.0		0.0000
32I Interr Sales	Block 1	7,354,982	0.51281	0.40805	0.00706	0.09770	2,248,312	\$675.00	76	2,863,912		1.0	899	0.0000
	Block 2	9,533,015	0.49810	0.40805	0.00700	0.08305						1.0		0.0000
	Block 3	5,139,982	0.47356	0.40805	0.00689	0.05862						1.0		0.0000
	Block 4	10,419,813	0.44904	0.40805	0.00679	0.03420						1.0		0.0000
	Block 5	4,025,372	0.43431	0.40805	0.00672	0.01954						1.0		0.0000
22 Inton Tree -	Block 6	173,013	0.42452	0.40805	0.00668	0.00979	E 600.076	403E 00	87	6 654 576		1.0	2 000	0.0000
32 Interr Trans	Block 1	8,967,105	0.09476	0.00000	(0.00111)	0.09587	5,688,876	\$925.00	8/	6,654,576		1.0	2,088	0.0000
	Block 2	15,920,961	0.08060	0.00000	(0.00090)	0.08150						1.0		0.0000
	Block 3 Block 4	11,590,796	0.05698 0.03335	0.00000 0.00000	(0.00055) (0.00020)	0.05753 0.03355						1.0 1.0		0.0000
	Block 4 Block 5	30,144,365 57,187,852	0.03335	0.00000	(0.00020) 0.00001	0.03355 0.01918						1.0		0.0000
	Block 5 Block 6	78,650,314	0.01919	0.00000	0.00015	0.01918						1.0		0.0000
33	BIOCK 6	78,050,314	0.00977	0.00000	(0.00009)	0.00962	0	\$38,000.00	0	0		1.0	0	0.0000
TOTALS		957,339,742	0.00312	0.00000	(0.00003)	0.00551	237,539,012	\$30,000.00		312,626,300		312,626,300	98,110	0.0000
Sources for line 2 Inputs page	2 above	:										Line 67		
Tariff Schedules Rate Adjustment	Schedu	le	_									Sched 178		

64
 65 Note: Allocation to rate schedules or blocks with zero volumes is calculated on an overall margin percentage change basis.

66 * Since Billing Rates for all schedules above 31 do not include demand, column c for those schedules is WACOG only

1 2		Twelve Months Ended 06/30/14	
3	Total Billed Gas Sales Revenues	668,271,650	
4	Total Oregon Revenues	691,523,698	
5			
6	Regulatory Commission Fees [1]	1,728,809	0.250% Statutory rate
7	City License and Franchise Fees	16,182,350	2.340% Line 7 ÷ Line 4
8	Net Uncollectible Expense [2]	1,290,601	0.187% Line 8 ÷ Line 4
9			
10	Total	19,201,760	2.777% Sum lines 8-9
11			

11

12

13 <u>Note:</u>

14 [1] Dollar figure is set at statutory level of 0.25% times Total Oregon Revenues (line 4)

15 [2] Represents the normalized net write-offs based on a three-year average.

NW Natural Rates & Regulatory Affairs 2014-2015 PGA Filing - August Filing Summary of Deferred Accounts Included in the PGA

Exhibit A - Supporting Materials EXNIDIL A - Supporting NWN OPUC Advice No. 14-12/UG ____ Page 3 of 5

Page 3	3 of 5
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501	Account	Balance 6/30/2014	Adjustment	Jul-Sep Estimated Activity	Jul-Oct Interest	Estimated Balance 10/31/2014	Interest Rate During Amortization	Estimated Interest During Amortization	Total Estimated Amount for (Refund) or Collection	Amounts Excluded from PGA Filing	Amounts Included in PGA Filing
	Α	В	С	D	E	F	G1	G2	н	I	J
						F = sum B thru E		1.77%	H = F + G2		Excl. Rev Sens
1	Miscellaneous Amortizations	I									
3	254315 PROPERTY SALES AMORT	(495,923)		591,574	(1,174)	94,477	1.77%	908	95,385		95,385

Company:	Northwest Natural Gas Company
State:	Oregon
Description:	Property Sales Amort OR
Account Number:	254315
Info:	Docket UG 259
	Authorization to amortize in Order 13-403

Debit (Credit) 1

2

3								Total
4	Month/Year	Note	Amortization	Transfers	Interest Rate	Interest	Activity	Balance
5	(a)	(b)	(C)	(d)	(e)	(f)	(g)	(h)
6								
7	Beginning Balance							
8	Nov-13	1	141,982	(3,634,353)	1.38%	(4,098)	(3,496,469)	(3,496,469)
9	Dec-13		623,998		1.38%	(3,662)	620,336	(2,876,133)
10	Jan-14		671,503		1.38%	(2,921)	668,582	(2,207,551)
11	Feb-14		610,210		1.38%	(2,188)	608,022	(1,599,529)
12	Mar-14		437,617		1.38%	(1,588)	436,029	(1,163,500)
13	Apr-14		312,830		1.38%	(1,158)	311,672	(851,829)
14	May-14		215,401		1.38%	(856)	214,546	(637,283)
15	Jun-14		142,012		1.38%	(651)	141,360	(495,923)
16	Jul-14 fore	ecast	110,466		1.38%	(507)	109,960	(385,963)
17	Aug-14 fore	ecast	111,169		1.38%	(380)	110,790	(275,174)
18	Sep-14 fore	ecast	116,154		1.38%	(250)	115,904	(159,269)
19	Oct-14 fore	ecast	253,784		1.38%	(37)	253,747	94,477 (2)

20 21

NOTES 1 - Transfer in is from the October balance of 254305 Property Sales Oregon and residual balance from 186279 Earnings Test Amortization. 22

2 - Forecasted residual balance remaining from Property Sales Gain amortized during the 2013-14 PGA year. 23

		Including Revenue Sensitve
1		<u>Amount</u>
2	Temporary Increments	
3		
4	Removal of Current Temporary Increments	
5	Amortization of Property Sales	\$3,803,453
6		
7	Addition of Proposed Temporary Increments	
8	Amortization of Property Sales Residual Balance	98,110
9		
10		
11	TOTAL OF ALL COMPONENTS OF RATE CHANGES	\$3,901,563
12		
13		
14		
15	2013 Oregon Earnings Test Normalized Total Revenues	\$672,195,000
16	, , , , , , , , , , , , , , , , , , ,	, , , , , , , , , , , , , , , , , , , ,
17	Effect of this filing, as a percentage change (line $11 \div$ line 15)	0.58%