

**KYLE WALKER, CPA**  
Rates/Regulatory Analyst  
Tel: 503.226.4211 Ext. 5858  
Fax: 503.721.2516  
Email: Kyle.Walker@nwnatural.com



February 27, 2018

**VIA ELECTRONIC FILING**

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

**Re: UM 1420 - Application for Reauthorization to Defer Certain Expenses or Revenues for Industrial Demand Side Management Accounting Programs**

In accordance with ORS 757.259 and OAR 860-027-0300, Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), files herewith an Application for Reauthorization to record and defer with interest all costs associated with studying, planning, administering, and delivering Demand Side Management ("DSM") programs to Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers.

A notice concerning this Application will be sent to all parties participating in the Company's current general rate case, UG 344. A copy of the notice and the certificate of service are attached to the application.

Please address correspondence on this matter to me 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, ext. 3589  
eFiling@nwnatural.com

If you have any questions, please contact me.

Sincerely,

/s/ Kyle Walker, CPA

Kyle Walker, CPA  
Rates/Regulatory Affairs Analyst

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1420**

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba, NW NATURAL

For Reauthorization to Defer Certain  
Expenses or Revenues Pursuant to  
ORS 757.259

**Application**

1 Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the  
2 “Company”) hereby files with the Public Utility Commission of Oregon (the  
3 “Commission”) this application (“Application”) seeking reauthorization to record and  
4 defer with interest all costs associated with studying, planning, administering, and  
5 delivering Demand Side Management (“DSM”) programs to Industrial Firm Sales  
6 Customers,<sup>1</sup> Industrial Interruptible Sales Customers,<sup>2</sup> and Schedule 32 Commercial  
7 Sales Customers<sup>3</sup> (referred to hereafter collectively as “Industrial Customers”) pursuant  
8 to ORS 757.262 and 757.259, and OAR 860-27-300, for the 12-month period beginning  
9 March 1, 2018 through February 28, 2019.

10 The Company has offered DSM programs to its Residential and Commercial  
11 Customers since 2002.<sup>4</sup> In 2009, the Company began offering its Industrial Customers

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<sup>1</sup> Industrial firm customers served on the Company’s Rate Schedules 3, 31, and 32.

<sup>2</sup> Industrial interruptible customers served on the Company’s Rate Schedules 31 and 32.

<sup>3</sup> Commercial customers served on Rate Schedule 32.

<sup>4</sup> The Company established Residential and Commercial DSM programs in accordance with Commission Order No. 02-634, which approved the Company’s Residential and Commercial

1 a program (“Industrial DSM Program”), established in response to NW Natural’s 2008  
2 Integrated Resource Plan (“IRP”) wherein the Company identified cost-effective DSM  
3 for its Industrial Firm Sales Customers.

4 Although the Company’s 2008 IRP did not include a DSM technical potential  
5 study for Industrial Interruptible Sales Customers, the program offering was extended to  
6 this customer class in accordance with the program parameters established in a  
7 Memorandum of Understanding (“MOU”) signed by NW Natural, Citizens’ Utility Board  
8 of Oregon (“CUB”), Northwest Industrial Gas Users (“NWIGU”) and Commission Staff  
9 (collectively referred to hereafter as “Parties”). The MOU stated the Company would  
10 provide an energy-efficiency program to Industrial Customers for two years, after which  
11 time Parties would consider whether the program should continue being offered to  
12 Interruptible Sales Customers. In 2011, Parties signed a new MOU agreeing that the  
13 pilot Industrial DSM Program should become a permanent offering. The program that is  
14 offered today continues to be applicable to all Industrial Customers except those  
15 receiving service under a transportation rate.

16 In support of this Application, NW Natural states:

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decoupling mechanism. *Re NW Natural Gas Co.’s Application for Public Purposes Funding and Distribution Margin Normalization*, Docket UG 143, Order No. 02-634 at 4–5 (Sept. 12, 2002). Because decoupling removes the risk of experiencing a lost margin when customers adopt efficiency measures, it was appropriate to simultaneously introduce DSM programs. Order No. 02-634 also established the Company’s public purpose charge which, in part, funds the Company’s Residential and Commercial DSM programs. As agreed to by parties of both decoupling dockets (UG 143 and UG 163), Industrial Customers were exempt from the decoupling mechanism and the public purpose charge. *Id.*; *Re NW Natural Gas Co. Investigation Regarding Possible Continuation of Distribution Margin Normalization Tariff*, Docket UG 163, Order No. 05-934 (Aug. 25, 2005). Commercial Customers served on Rate Schedule 32 were considered Industrial Customers at the time Commission Order No. 02-634 was issued and were, therefore, excluded from the DSM programs considered therein, as described below. *See id.*

1 **A. NW Natural.**

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

6 **B. Statutory Authority.**

7 This application is filed pursuant to ORS 757.259, which empowers the  
8 Commission to authorize the deferral of expenses or revenues of a public utility for  
9 later inclusion in rates.

10 **C. Communications.**

11 Communications regarding this Application should be addressed to:

12 NW Natural  
13 e-Filing for Regulatory Affairs  
14 220 NW Second Avenue  
15 Portland, Oregon 97209-3991  
16 Telephone: (503) 226-4211, ext. 3589  
17 Facsimile: (503) 721-2516  
18 Email: eFiling@nwnatural.com;

19  
20 Zachary D. Kravitz (OSB# 152870)  
21 Associate Counsel  
22 220 NW Second Avenue  
23 Portland, Oregon 97209-3991  
24 Phone: (503) 220-2379  
25 Email: zdk@nwnatural.com;

26  
27 And

28  
29 Kyle Walker, CPA  
30 Rates & Regulatory Affairs  
31 220 NW Second Avenue  
32 Portland, Oregon 97209-3991  
33 Phone: (503) 226-4211 Ext. 5858  
34 Email: Kyle.Walker@nwnatural.com  
35

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

4 In this Application, the Company is requesting to defer the costs associated with  
5 studying, planning, administering, and delivering its Industrial DSM Program. This  
6 program seeks to acquire DSM for Industrial Sales Customers, and Schedule 32  
7 Commercial Sales Customers to the extent it is cost-effective.

8 The Energy Trust administers the Company's Industrial DSM Program. The  
9 Energy Trust is a non-profit organization established in response to Oregon's electric  
10 deregulation legislation, which requires third-party administration of independently  
11 owned electric utilities' DSM Programs.<sup>5</sup> The Energy Trust currently administers NW  
12 Natural's Residential and Commercial DSM programs,<sup>6</sup> as well as the Company's  
13 Industrial DSM Program for which this Application seeks approval to defer costs.

14 The Company's Industrial DSM Program complies with the stipulation adopted in  
15 Commission Order No. 05-934. That stipulation prevents the Company from charging  
16 the Schedule 301, Public Purpose Charge to Industrial Customers served on Schedules  
17 3, 31, 32, and special contracts as well as prevents those customers from being eligible  
18 for Energy Trust DSM Programs funded by the Public Purpose Charge.<sup>7</sup> The Industrial  
19 DSM Program discussed in this Application will not be charged under Schedule 301.  
20 Instead, the Company will defer all costs associated with the administration and delivery  
21 of the Industrial DSM Program for future amortization among Industrial Firm Sales

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<sup>5</sup> ORS 757.612(3)(c).

<sup>6</sup> Order No. 02-634 requires third party administration of NW Natural's Residential and Commercial DSM Programs. *Re NW Natural Gas Co.'s Application for Public Purposes Funding and Distribution Margin Normalization*, Docket UG 143, Order No. 02-634 at 5 (Sept. 12, 2002).

<sup>7</sup> *Re NW Natural Gas Co. Investigation Regarding Possible Continuation of Distribution Margin Normalization Tariff*, Docket UG 163, Order No. 05-934, Appendix A at 3 (Aug. 25, 2005).

1 Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial  
2 Sales Customers in the Company’s next annual Purchased Gas Adjustment  
3 Mechanism.

4 **E. Reasons for Application for Reauthorization of Deferred Accounting – OAR**  
5 **860-027-0300(3)(b).**

6  
7 The Company requests deferral of the costs associated with the administration  
8 and delivery of the Industrial DSM Program. ORS 757.259 is a “statutorily authorized  
9 exception to the general prohibition against retroactive ratemaking” that allows a  
10 “means to address utility expenses or revenues outside of the utility’s general rate case  
11 proceeding.”<sup>8</sup> Under ORS 757.259(2)(e), the Commission has discretion to authorize a  
12 deferral of “[i]dentifiable utility expenses or revenues, the recovery or refund of which  
13 the commission finds should be deferred in order to minimize the frequency of rate  
14 changes . . . or to match appropriately the costs borne by and benefits received by rate  
15 payers.” To determine whether an expense or revenue should be deferred, the  
16 Commission “utilizes a flexible, fact-specific approach that acknowledges the wide  
17 range of reasons why deferred accounting might be beneficial to customers.”<sup>9</sup> Of those  
18 reasons, the Commission has found that “encourag[ing] utility or customer behavior  
19 consistent with regulatory policy” is appropriate for deferred accounting.<sup>10</sup>

20 This request seeks to align the benefits customers receive from the Company’s  
21 Industrial DSM Program with the costs of the program by allowing the Company to defer

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<sup>8</sup> *In re Matter Public Utility Commission of Oregon Staff Request to Open Investigation Related to Deferred Accounting*, Docket UM 1147, Order No. 05-1070 at 2 (October 5, 2005).

<sup>9</sup> *In re Matter Public Utility Commission of Oregon Staff Request to Open Investigation Related to Deferred Accounting*, Docket UM 1147, Order No. 05-1070 at 5 (October 5, 2005).

<sup>10</sup> *Id.* at 2.

1 the program costs for later inclusion in rates.

2 **F. Accounting – OAR 860-027-0300(3)(c).**

3 Beginning on March 1, 2018 and ending twelve months from this date, NW  
4 Natural proposes to account for the deferred expenses related to the Industrial DSM  
5 Program by recording the deferral in a sub-account of Account 186 (Miscellaneous  
6 Deferred Debits). In the absence of deferred accounting, the Company would  
7 record Industrial DSM Program expenses in the appropriate sub-account of FERC  
8 Account 909.

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

10 The Company estimates the amount to be recorded in the deferred account for  
11 the 12-month period beginning March 1, 2018 through February 28, 2019 to be  
12 approximately \$520,024.

13 **H. Entries into deferred account during past 12 months – OAR 860-027-  
14 300(4)(a)**

15 Exhibit A, which is attached, demonstrates all amounts deferred to date under  
16 UM 1420.

17 **I. Reason for Continuation of Deferral Account – OAR 860-027-0300(4)(b)**

18 The Company continues to offer its Industrial DSM Program. The acquisition of  
19 cost-effective DSM is in compliance with OAR 860-027-0310 which encourages utilities  
20 to provide the least cost resources as identified in its most recent IRP.

21 **J. Requirement per Commission Order No. 09-263**

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

6 – UM 1420 - APPLICATION FOR REAUTHORIZATION TO DEFER CERTAIN EXPENSES OR REVENUES

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

4           The document called “Exhibit B 2018 Funding Schedule” provides the  
5           installments from March 1, 2018 through February 28, 2019 and is attached  
6           as Exhibit B. The Summary Sheet will be included in the 2018 PGA filing  
7           work papers and in the electronic file entitled "Proposed Temps Oregon 2018-  
8           19 PGA filing.xlsx.”

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

10           This application is for the 12-month period beginning March 1, 2018, and  
11           ending February 28, 2019.

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

13           Approval to defer costs associated with the Industrial DSM Program was last  
14           granted under Commission Order No. 17-131

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

16           The amount deferred during the last deferral year of March 1, 2017, through  
17           February 28, 2018 was \$5,920,596 plus interest on the deferral of \$296,937.

18           **5. The amount amortized last year.**

19           \$689,768 was amortized in rates November 1, 2017 through December 31,  
20           2017.

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

22           The interest rate for deferral accounts is 7.778%.

23



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

2           In the 2018 PGA filing, the Company estimates that it will seek to defer  
3           \$520,024 and amortize \$6,217,533.

4   **K. Notice – OAR 860-027-0300(3)e(6).**

5           A notice of this Application has been served on the all parties who are  
6   participating in the Company’s most recent general rate case, UG 344, and is attached  
7   to this Application.

8           NW Natural respectfully requests that the Commission issue an order  
9   reauthorizing the Company to defer the expenses described in the Application to ensure  
10   that the Company will be authorized to seek to recover costs associated with the  
11   studying, planning, administering, and delivering its Industrial DSM Program

12                   Dated on this 27th day of February, 2018.

13                                   Respectfully Submitted,

14                                   NW NATURAL

15                                   /s/ Kyle Walker, CPA  
16                                   Kyle Walker, CPA  
17                                   Rates/Regulatory Analyst

18  
19                                   /s/ Zachary D. Kravitz  
20                                   Zachary D. Kravitz (OSB# 152870)  
21                                   Associate Counsel  
22                                   220 NW Second Avenue  
23                                   Portland, Oregon 97209-3991  
24                                   Phone: (503) 220-2379  
25                                   Email: zdk@nwnatural.com  
26

**Exhibit A**  
 Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Deferral of Industrial DSM Costs  
 Account Number: 186232  
 Docket UM 1420  
 2017-18 Deferral approval is TBD

*Deferrals are authorized on a program year (Mar - Feb). The total balance is broken down into separate deferral years for convenience of review*

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23
Debit	(Credit)	Month/Year	Note	Deferral	Transfers	TOTAL Interest	Interest Rate	Mar 15-Feb 16 Interest	Mar 16-Feb 17 Interest	Mar 17-Feb 18 Interest	Activity	TOTAL Balance	Mar15-Feb16 Balance	Mar 16- Feb 17 Balance	Mar 17 - Feb 18 Balance							
(a)	(b)	(c)	(d)	(e)	(e1)	(e2)	(e3)	(e4)	(e5)	(e6)	(f)	(g)	(g7)	(g8)	(g9)							
88	Mar-16	0		0	7.78%	0	0	0	0	0	0	3,224,384	3,224,384	-	-							
89	Apr-16	1,009,017		3,271	7.78%	3,271	3,271	3,271	3,271	3,271	1,012,288	4,236,672	3,224,384	1,012,287.90	1,012,287.90							
90	May-16	0		6,563	7.78%	6,563	6,563	6,563	6,563	6,563	6,563	4,243,235	3,224,384	1,018,850.90	1,018,850.90							
91	Jun-16	0		6,606	7.78%	6,606	6,606	6,606	6,606	6,606	6,606	4,249,840	3,224,384	1,025,456.45	1,025,456.45							
92	Jul-16	1,009,017		9,919	7.78%	9,919	9,919	9,919	9,919	9,919	1,018,936	5,268,777	3,224,384	2,044,392.72	2,044,392.72							
93	Aug-16	0		13,254	7.78%	13,254	13,254	13,254	13,254	13,254	13,254	5,282,031	3,224,384	2,057,647.20	2,057,647.20							
94	Sep-16	0		13,340	7.78%	13,340	13,340	13,340	13,340	13,340	13,340	5,295,372	3,224,384	2,070,987.61	2,070,987.61							
95	Oct-16	1,009,018		16,698	7.78%	16,698	16,698	16,698	16,698	16,698	1,025,716	6,321,087	3,224,384	3,096,703.41	3,096,703.41							
96	Nov-16	1	(3,224,384)	20,077	7.78%	20,077	20,077	20,077	20,077	20,077	(3,204,307)	3,116,780	3,116,780.37	3,116,780.37	3,116,780.37							
97	Dec-16	0		500,000	7.78%	21,822	21,822	21,822	21,822	21,822	521,822	3,638,603	3,638,602.72	3,638,602.72	3,638,602.72							
98	Jan-17	0		23,584	7.78%	23,584	23,584	23,584	23,584	23,584	23,584	3,662,187	3,662,186.93	3,662,186.93	3,662,186.93							
99	Feb-17	2		23,737	7.78%	23,737	23,737	23,737	23,737	23,737	23,738	3,685,925	3,685,925.00	3,685,925.00	3,685,925.00							
100	Mar-17	1,720,596		5,576	7.778%	5,576	5,576	5,576	5,576	5,576	1,726,172	5,412,097	3,685,925.00	3,685,925.00	1,726,172.16							
101	Apr-17	0		11,188	7.778%	11,188	11,188	11,188	11,188	11,188	11,188	5,423,286	3,685,925.00	3,685,925.00	1,737,360.63							
102	May-17	0		11,261	7.778%	11,261	11,261	11,261	11,261	11,261	11,261	5,434,547	3,685,925.00	3,685,925.00	1,748,621.62							
103	Jun-17	0		11,334	7.778%	11,334	11,334	11,334	11,334	11,334	11,334	5,445,881	3,685,925.00	3,685,925.00	1,759,955.60							
104	Jul-17	2,000,000		17,889	7.778%	17,889	17,889	17,889	17,889	17,889	2,017,889	7,463,770	3,685,925.00	3,685,925.00	3,777,844.71							
105	Aug-17	0		24,487	7.778%	24,487	24,487	24,487	24,487	24,487	24,487	7,488,256	3,685,925.00	3,685,925.00	3,802,331.44							
106	Sep-17	0		24,645	7.778%	24,645	24,645	24,645	24,645	24,645	24,645	7,512,902	3,685,925.00	3,685,925.00	3,826,976.88							
107	Oct-17	0		31,935	7.778%	31,935	31,935	31,935	31,935	31,935	2,231,935	9,744,837	3,685,925.00	3,685,925.00	6,058,911.90							
108	Nov-17	1	(3,685,925)	39,272	7.778%	39,272	39,272	39,272	39,272	39,272	(3,646,653)	6,098,184	6,098,184	6,098,184	6,098,183.75							
109	Dec-17	0		39,526	7.778%	39,526	39,526	39,526	39,526	39,526	39,526	6,137,710	6,137,710	6,137,710.14	6,137,710.14							
110	Jan-18	0		39,783	7.778%	39,783	39,783	39,783	39,783	39,783	39,783	6,177,493	6,177,493	6,177,492.73	6,177,492.73							
111	Feb-18	0		40,040	7.778%	40,040	40,040	40,040	40,040	40,040	40,040	6,217,533	6,217,533.18	6,217,533.18	6,217,533.18							

History truncated for ease of viewing

**NOTES**

- 1 - Transfer February balance of prior program year to 186233 Amort Industrial DSM for amortization
- 2 - Transfer represents a balance true-up adjustment.

<b>Summary:</b>	
<b>March 1, 2017 - February 28, 2018 Deferral Year:</b>	
Deferrals	5,920,596
Interest	296,937
<b>Total Deferral Balance at 2/28/18</b>	<b>6,217,533</b>

**EXHIBIT B  
2018 FUNDING SCHEDULE**

In compliance with Section 5 of the 2013 Industrial DSM Funds and Information Transfer Agreement of which this Exhibit is a part and updates, for 2018 NW Natural will pay Industrial Funds to Energy Trust for Services in accordance with the following schedule:

**Installments:**

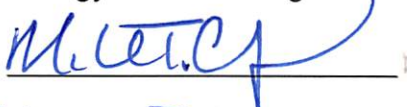
January 28, 2018	\$ 0
July 28, 2018	\$ 0
October 28, 2018	\$ 520,024

In the event the 28<sup>th</sup> of the month should fall on a weekend, or a United States of American Federal holiday, then the required funding shall be transferred on the last business day before the weekend or holiday.

The above stated funding for \$4,117,457 in Industrial Funds to be distributed to Energy Trust in 2018 is for acquisition of approximately 1,515,548 therm savings. The 2018 funding schedule is based on the following budget:

Funding necessary for 1,515,548 therm savings	\$3,917,457
Contingency Reserve	\$200,000
Less 2017 carryover	\$3,597,333
<b>2018 Funding Requirement</b>	<b>\$520,024</b>

Energy Trust of Oregon



MICHAEL T. COLGRAVE

EXECUTIVE DIRECTOR

Date 1/25/18

NW Natural



DAVID ANDERSON - CEO

Date 1/30/18

UM 1420-NWN's 2018 Application to Defer Industrial DSM Costs  
December XX, 2017

<b>2018 Industrial DSM Budget</b>	
Funding necessary for 1,515,548 therm savings	\$3,917,457
Contingency Reserve	\$200,000
<u>Less 2017 carryover</u>	<u>\$3,597,333</u>

**2018 Funding Requirement** **\$520,024**

**Installments:**

January 28, 2018	\$ 0
July 28, 2018	\$ 0
October 28, 2018	\$ 520,024

<b>Historic Program Results</b>		
	Forecasted Savings	Actual Savings
2017	1,236,317	TBD
2016	1,844,324	2,050,224
2015	1,283,820	2,378,538
2014	1,207,434	1,291,168
2013	902,362	1,035,241
2012	864,174	863,771
2011	841,061	927,687

\*preliminary savings estimate for 2017 official results available April 2018

\*\*2011-2014 savings "Trued-up" post evaluation



UM 1420

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO  
DEFER CERTAIN EXPENSES OR REVENUES**

February 27, 2018

**To All Parties Participating in UG 344**

Please be advised that on February 27, 2018 Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for REAUTHORIZATION TO DEFER COSTS ASSOCIATED WITH STUDYING, PLANNING, ADMINISTERING, AND DELIVERING ITS INDUSTRIAL DSM PROGRAM. 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 participating in the Company's most recent general rate case, UG 344, that a 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 March 27, 2018. 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 1420**

I hereby certify that on February 27, 2018, I have served by electronic mail the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER COSTS ASSOCIATED WITH STUDYING, PLANNING, ADMINISTERING, AND DELIVERING ITS INDUSTRIAL DSM PROGRAM upon all parties of record in docket UG 344, which is the Company's most recent general rate case.

**UG 344**

*OPUC DOCKETS  
OREGON CITIZENS UTILITY BOARD  
dockets@oregoncub.org*

*ROBERT JENKS  
OREGON CITIZENS UTILITY BOARD  
bob@oregoncub.org*

*MICHAEL GOETZ  
OREGON CITIZENS UTILITY BOARD  
MIKE@oregoncub.org*

*MCDOWELL RACKNER & GIBSON PC  
dockets@mrg-law.com*

*MARIANNE GARDNER  
PUBLIC UTILITIES COMMISSION  
Marianne.gardner@state.or.us*

*STEPHANIE ANDRUS  
PUBLIC UTILITY COMMISSION  
Stephanie.andrus@state.or.us*

*TOMMY A. BROOKS  
CABLE HUSTON BENEDICT HAAGENSEN &  
LLOYD  
tbrooks@cablehuston.com*

*CHAD M. STOKES  
CABLE HUSTON BENEDICT  
HAAGENSEN & LLOYD  
cstokes@cablehuston.com*

*EDWARD FINKLEA  
NORTHWEST INDUSTRIAL GAS USERS  
efinklea@nwigu.org*

*BRYAN CONWAY  
PUBLIC UTILITY COMMISSION  
bryan.conway@state.or.us*

DATED February 27, 2018, Portland, OR.

/s/ Erica Lee  
Erica Lee  
Rates & Regulatory Affairs  
NW NATURAL  
220 NW Second Avenue  
Portland, Oregon 97209-3991  
503.226.4211, extension 3589  
erica.lee@nwnatural.com