

October 5, 2022

VIA ELECTRONIC FILING AND FEDEX MAIL

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

Re: Consolidated UG 435 / UG 411 / Application of NW Natural for a General Rate Revision/Schedule 198 Renewable Natural Gas Recovery Mechanism Attestation filed Pursuant to Stipulation.

To PUC Filing Center:

On May 31, 2022, Northwest Natural Gas Company d/b/a NW Natural (“NW Natural” or the “Company”), Staff of the Public Utility Commission of Oregon, the Oregon Citizens’ Utility Board, the Alliance of Western Energy Consumers, and the Small Business Utility Advocates (collectively, the “Stipulating Parties”) filed a Multi-Party Stipulation Regarding Revenue Requirement, Rate Spread and Certain Other Issues (the “Stipulation”). Under the terms of Paragraph 3 of the Stipulation, NW Natural agreed to file an attestation of a Company officer (“Officer Attestation”) by October 5, 2022, identifying which of the projects listed in Appendix C to the Stipulation (1) are complete and in-service, or (2) the Company does not anticipate will be on-line by October 31, 2022.

In compliance with Paragraph 3 of the Stipulation, NW Natural files the attestation of Zachary D. Kravitz, Vice President, Rates & Regulatory Affairs. Attached to Mr. Kravitz’s attestation is an updated version of Appendix C to the Stipulation. The attached updated version of Appendix C to the Stipulation identifies which of the projects listed therein (1) are complete and in-service, or (2) the Company does not anticipate will be on-line by October 31, 2022. For the projects listed in the attached updated version of Appendix C to the Stipulation that are complete and in-service, the Company has identified the Actual In-Service Date and Actual Completed Cost of each such project. The cost of the identified projects not anticipated to be on-line by October 31, 2022, will be completely removed from rate base for purposes of calculating the rates pursuant to the Stipulation, and rates adjusted accordingly.

Mr. Kravitz’s attestation also addresses Paragraphs 6 and 7 of the Stipulation regarding the Horizon 1 Start-Up Cost Deferral and the TSA Security Directive Deferral, respectively.

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Please note that NW Natural is filing a non-confidential version and a highly confidential version, which contains information that represents business-sensitive, non-public information and will be provided subject to Modified Protective Order No. 21-465.

Please do not hesitate to call if you have any questions about this matter.

Respectfully submitted,

/s/ Zachary D. Kravitz

Zachary D. Kravitz
Vice President, Rates & Regulatory Affairs
Northwest Natural Gas Company

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UG 435 AND UG 411**

In the Matter of
NW NATURAL GAS COMPANY D/B/A
NW NATURAL

Request for a General Rate Revision
(UG 435), and

Advice 20-19, Schedule 198 Renewable
Natural Gas Recovery Mechanism
(ADV 1215) (UG 411).

**OFFICER ATTESTATION OF
ZACHARY D. KRAVITZ**

1 STATE OF OREGON)
2) ss
3 COUNTY OF MULTNOMAH)
4

5 I, Zachary D. Kravitz, being first duly sworn an oath, depose and say:

6 1. My name is Zachary D. Kravitz. I am employed by Northwest Natural Gas Company
7 dba NW Natural (“NW Natural” or the “Company”) as Vice President, Rates &
8 Regulatory Affairs.

9 2. I am making this attestation in compliance with Paragraph 3 of the Multi-Party
10 Stipulation filed in these dockets on May 31, 2022 (the “Stipulation”).

11 3. Attached to this attestation is an updated version of Appendix C to the Stipulation, in
12 accordance with Paragraph 3 of the Stipulation. The attached updated version of
13 Appendix C to the Stipulation identifies which of the projects listed therein (1) are
14 complete and in-service, (2) expected to be placed in-service by October 31, 2022, or
15 (3) the Company does not anticipate will be on-line by October 31, 2022. For the
16 projects listed in the attached updated version of Appendix C to the Stipulation that

1 are complete and in-service by August 31, 2022, the Company has identified the in-
2 service date and actual costs of the projects. For projects that recently have been
3 placed in-service or are expected to be placed in-service by October 31, 2022, the
4 Company will update the costs of these projects in its October 24, 2022 attestation.
5 The cost of the identified projects not anticipated to be placed in-service by October
6 31, 2022, will be completely removed from rate base for purposes of calculating the
7 rates pursuant to the Stipulation, and rates adjusted accordingly.

8 4. In accordance with Paragraph 6 of the Stipulation regarding the Horizon 1 Start-Up
9 Cost Deferral, the Company will provide in its attestation filed by October 24, 2022, a
10 demonstration of compliance with the terms of the stipulation approved in Order No.
11 21-246 and will include a final amortization schedule for the deferral. The final
12 balance of the deferral is not known at the time of this attestation.

13 5. In accordance with Paragraph 7 of the Stipulation regarding the TSA Security
14 Directive Deferral, the Company will provide in its attestation filed by October 24,
15 2022, the balance of the deferral by October 31, 2022. The final balance of the
16 deferral is not known at the time of this attestation. If the amount of the actual
17 balance of the deferral is less than the amount proposed in the Initial Filing, the
18 Company will remove the excess amount from rates.

19 I declare under penalty of perjury under the laws of the State of Oregon that the foregoing
20 is true and correct based on my information and belief.

21 Signed this 5th day of October, 2022, at Portland, Oregon.

22
23


Zachary D. Kravitz

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2 SUBSCRIBED AND SWORN to be before this 5th day of October 2022.

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Stephanie Rae Baxter
Notary Public, State of Oregon

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My Commission Expires 3/4/2023

NW Natural
UG 435 - Appendix C

Project Name	Dollars in Millions			
	Expected In-Service Date	Forecasted Cost in GRC	Actual In-Service Date	Actual Completed Cost
Horizon 1 [1]	Jul-22	\$ 63.7	Sep-22	\$ 63.7
Kuebler Blvd Reinforcement [1]	Oct-22	\$ 21.3	Oct-22	\$ 21.3
Lincoln City Resource Center [1][2]	Nov-22	\$ 14.2	Oct-22	\$ 14.2
Astoria/Warrenton Resource Center	May-22	\$ 11.7	Nov-21	\$ 12.7
Central Resource Center (Phase 1)	Oct-22	\$ 10.1	Feb-22	\$ 12.6
M365 Implementation Program (Cloud Based) [1]	Oct-22	\$ 6.6	Oct-22	\$ 6.6
NLNG Pretreatment Regeneration Improvements	Oct-22	\$ 5.1	Jul-22	\$ 6.1
Mist 300-400 Upgrade	May-22	\$ 3.5	Dec-21	\$ 4.0
IT&S Enterprise Foundations - System Integration Platform Implementation [1][3]	Oct-22	\$ 3.5	Oct-22	\$ 3.5
P31 - McMinnville [1] [2]	Dec-22	\$ 3.4	Oct-22	\$ 3.4
Mist Well Rework 2022 [1]	Oct-22	\$ 3.3	Sep-22	\$ 3.3
Mist Well Rework 2021 [4]	Oct-22	\$ 3.1	Sep-21	\$ 2.0
IT&S Enterprise Foundations - Data Reporting & Analytics [1][3]	Oct-22	\$ 2.9	Oct-22	\$ 2.9
Tech Refresh - Voice Radio [1]	May-22	\$ 2.9	Oct-22	\$ 2.9
E04 - 6 and 8 inch ILL Conversion [5]	Oct-22	\$ 2.8		
Mist Corrosion Abatement 4	Jul-22	\$ 2.7	Jul-22	\$ 3.5
Tualatin Sherwood Rd. Grading [1]	Oct-22	\$ 2.6	Oct-22	\$ 2.6
E15 - S. Eugene Trans	Jun-22	\$ 2.2	Apr-22	\$ 2.7
Calvin Creek Electric Conductor Replacement	Jun-22	\$ 2.0	Apr-22	\$ 2.1
Tech Refresh - Telemetry [1]	Oct-22	\$ 1.7	Oct-22	\$ 1.7
NLNG T-1 Foundation Heating [1]	Oct-22	\$ 1.7	Sep-22	\$ 1.7
Mist Electrical Systems Updates [1]	Oct-22	\$ 1.7	Oct-22	\$ 1.7
Natural Forces Projects [5]	Oct-22	\$ 1.4		
E08 Springfield Trans 8 in. ILL [1]	Oct-22	\$ 1.4	Oct-22	\$ 1.4
Newport Switchgear Replacement [5]	Oct-22	\$ 1.3		
Physical Security Enhancements Program [5]	Oct-22	\$ 1.1		
PLNG Boil Off Compressor [5]	Oct-22	\$ 1.1		
300-400 Cooler Replacement [1]	Jul-22	\$ 0.8	Sep-22	\$ 0.8
317th and Jackson Measurement [1]	Oct-22	\$ 0.8	Oct-22	\$ 0.8
202437 Mist GC 600 Compressor Rebuild [1]	Aug-22	\$ 0.7	Sep-22	\$ 0.7
300-400 Header Valve Automation	Aug-22	\$ 0.6	Jun-22	\$ 1.8
TBD1845 Fire System Upgrade [5]	Sep-22	\$ 0.6		
202438 Mist GC500 Compressor Rebuild	Jun-22	\$ 0.6	Aug-22	\$ 1.0
Miller Station TI [5]	Oct-22	\$ 0.5		
TBD52418 PLNG Glycol Heat Exchanger [1]	Sep-22	\$ 0.5	Oct-22	\$ 0.5
202286 Miller Station Level Controller Upgrade	Mar-22	\$ 0.5	Aug-22	\$ 0.6
300-400 Heavy Piston Upgrade	Sep-22	\$ 0.4	Jul-22	\$ 0.5
300-400 Suction and Recycle Control Valve	Sep-22	\$ 0.4	Jun-22	\$ 0.8
GC500&GC600 Separator Dump Valve Upgrade [1]	Oct-22	\$ 0.4	Sep-22	\$ 0.4
TBD1843 300-400 Hot Start Rebuild [1]	Sep-22	\$ 0.3	Oct-22	\$ 0.3
202440 Als and Reichfold Becker valves [2]	Dec-22	\$ 0.2	Aug-22	\$ 0.3
202407 Delta & Green Acres Dist Reg [1]	May-22	\$ 0.2	Oct-22	\$ 0.2
202370 Mist GC 500 HMI and Controls Upgrade [5]	Jul-22	\$ 0.2		

[1] Project has been recently placed in-service or is expected to be placed in-service in October 2022. For the October 5, 2022 attestation, NW Natural is using the "Forecasted Cost in GRC" as a placeholder for Actual Cost. This will be updated in the October 24, 2022

[2] The Expected In-Service Date of this project should have read Oct-22.

[3] These two sub-projects, or work streams, were part of a larger project, "IT&S Enterprise Foundations". The actual completed cost is the combined project cost with an estimate of \$6.4M and actual of \$7.2M.

[4] The Expected In-Service Date of this project should have read Dec-21.

[5] The Company does not anticipate that this project will go into service by October 31, 2022.



CERTIFICATE OF SERVICE
UG 435 / UG 411

I hereby certify that on October 5, 2022, I have served the unredacted, highly confidential version of APPENDIX C TO THE ATTESTATION FILED PURSUANT TO STIPULATION upon parties of record in docket UG 435 by FedEx mail.

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DATED October 5, 2022, Portland, OR.

/s/ Suzanne Prinsen
Suzanne Prinsen
McDowell Rackner Gibson PC