

Rates and Regulatory Affairs  
Facsimile: 503.721.2532



August 15, 2005

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
550 Capitol Street, N.E., Suite 215  
Post Office Box 2148  
Salem, Oregon 97308-2148

ATTN: Filing Center

Re: **OPUC Docket UM 1027: Application for Reauthorization of Deferred Accounting of Refunds or Collections of Distribution Margin**

Northwest Natural Gas Company, dba NW Natural (NW Natural or company), files herewith the above-referenced Application for Deferred Accounting of Refunds or Collections of Distribution Margin. The application is filed in order to reauthorize deferrals relative to the company's refunds or collections of distribution margin.

A notice concerning this application will be sent to all parties who participated in the company's most recent general rate case, UG 152. A copy of the notice is attached to the enclosed application as Exhibit A.

Please call me at 1-503-721-2487 if you have any questions or require any further information.

Sincerely,

C. Alex Miller, General Manager  
Rates & Regulatory Affairs

CAM/cmt  
enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1027

NW Natural Application for Reauthorization )  
For Deferred Accounting of Refunds or )  
Collections of Distribution Margin )

In accordance with ORS 757.259 and ORS 757.262, and OAR 860-030-0035, NW Natural (or the “Company”) files this application with the Public Utility Commission of Oregon (the “Commission”) for an order authorizing the Company to record and defer with interest, on an ongoing basis, the amount by which actual distribution margin per residential and commercial customer is different from the margin to be collected from residential and commercial customers based on “normal” consumption, as assumed in the company’s most recent general rate case. The Company respectfully requests that the deferral commence as of the date of this filing for later amortization in rates.

In support of this Application, NW Natural states:

**1. NW Natural**

NW Natural is a public utility in the state of Oregon and is subject to the jurisdiction of the Commission with regard to rates, service, and accounting practices. NW Natural also provides retail natural gas service in the states of Oregon and Washington.

## **2. Statutory Authority**

This Application is filed pursuant to ORS 757.259 and ORS 757.262, which empower the Commission to authorize the deferral of expenses or revenues of a public utility for later incorporation in rates.

## **3. Communications**

Communications regarding this Application should be addressed to:

C. Alex Miller, Director  
Regulatory Affairs & Forecasting  
NW Natural  
220 NW Second Avenues  
Portland, OR 97209-3991  
Telephone: (503) 721-2487  
Facsimile (503-721-2532  
E-mail: [c2m@nwnatural.com](mailto:c2m@nwnatural.com)

and

Onita R. King, Manager  
Tariffs & Regulatory Compliance  
NW Natural  
220 NW Second Avenues  
Portland, OR 97209-3991  
Telephone: (503) 721-2452  
Facsimile (503-721-2532  
E-mail: [ork@nwnatural.com](mailto:ork@nwnatural.com)

## **4. Basis for Application**

On September 12, 2002, the Commission issued Order No. 02-634, which among other effects, approved the partial decoupling mechanism described in the Settlement Agreement in Docket UG 143. The Commission's policies, expressed in Order No. 92-1673 and in statute at ORS 757.262, support recovery of utility revenues and earnings that are affected by the conservation activity of its customers.

## **5. NW Natural Proposal**

In accordance with the statutory authority provided by ORS 767.259 and ORS 757.262, and the Commission's approval of the Settlement Agreement in Docket UG 143, NW Natural proposes to record and defer, with interest, the amount by which actual distribution margin per residential and commercial customer is different from the margin to be collected from residential and commercial customers based on "normal" consumption, as assumed in the company's most recent general rate case filing in Docket UG 152 and further adjusted for price elasticity effects since the rate case.

## **6. Amounts Subject to Deferral**

NW Natural cannot estimate what amounts will be recorded in the distribution margin normalization "use balancing account" for the upcoming 12-month period because the amount is dependent on volume variance resulting from the actual price elasticity and conservation responses.

## **7. Accounting**

NW Natural proposes to record the amounts described in paragraph (a) above of this Application in a subaccount of Account 186. In the absence of the Commission's approval of this Application, the company would record under- or over-collected distribution margin as utility operating revenue in FERC Account 400.

WHEREFORE, NW Natural respectfully requests that in accordance with ORS 757.259, as amended, the Commission authorize the Company to record and defer, on an ongoing basis and commencing as of the date of this filing, the

amount by which actual distribution margin per residential and commercial customer is different from the margin assumed in UG 152 to be collected from residential and commercial customers based on “normal” consumption.

DATED this 15<sup>th</sup> day of August, 2005.

Respectfully submitted,

NW NATURAL

---

C. Alex Miller, Director  
Regulatory Affairs & Forecasting  
NW Natural  
220 N.W. Second Avenue  
Portland, Oregon 97209  
Phone: (503) 721-2487  
Facsimile: 503-721-2532  
Email: c2m@nwnatural.com

cc: Bonnie Tatom, OPUC  
UG 152 Service List



August 15, 2005

**NOTICE OF APPLICATION FOR REAUTHORIZATION OF  
DEFERRED ACCOUNTING OF  
REFUNDS OR COLLECTIONS OF DISTRIBUTION MARGIN**

**To All Parties Who Participated in UG 152:**

Please be advised that today Northwest Natural Gas Company, dba NW Natural (NW Natural or company), applied for reauthorization of deferred accounting of refunds or collections of distribution margin. Copies of the company's application are available for inspection at its main and district offices.

The purpose of this Notice is to inform parties and other interested persons that participated in the company's most recent general rate case that the Application was filed. **This is not a rate case.**

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 Public Utility Commission of Oregon as follows:

NW Natural  
Attn: Onita R. King  
220 N.W. Second Ave.  
Portland, Oregon 97209-3991  
Telephone: (503) 721-2452

Public Utility Commission of Oregon  
Attn: Bonnie Tatom  
550 Capitol St., N.E., Ste. 215  
P. O. Box 2148  
Salem, Oregon 97308-2148  
Telephone: (503) 378-6600

Any person may submit to the Commission written comments on the application by September 9, 2005. The granting of this application will not authorize a change in rates, but will permit the company to defer amounts in rates to a subsequent proceeding.

The company's district offices in Oregon are located at:

1970 14<sup>th</sup> Avenue SE  
Albany, Oregon 97322  
Telephone: (541) 926-4253

176 W. Marine Drive  
Astoria, Oregon 97103  
Telephone: (503) 325-1632

1625 N. 7<sup>th</sup> Street  
Coos Bay, Oregon 97420  
Telephone: (541) 267-5655

790 Goodpasture Island Road  
Eugene, Oregon 97401  
Telephone: (541) 342-3662

1405 S. W. Highway 101  
Lincoln City, Oregon 97367  
Telephone: (541) 994-2111

309 E. 2<sup>nd</sup> Street  
The Dalles, Oregon 97058  
Telephone: (541) 296-2229

3123 Broadway N.E.  
Salem, Oregon 97303  
Telephone: (503) 585-6611

\* \* \* \* \*



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER ACCOUNTING OF REFUNDS OR COLLECTIONS OF DISTRIBUTION MARGIN upon all parties of record in the UG 152 proceeding, which is the last general rate case filed by Northwest Natural Gas Company, dba NW Natural, by electronically mailing a copy thereof to the parties or attorneys of parties on the following official service list:

**UG 152 Service List**

JASON EISDORFER  
CITIZENS UTILITY BOARD OF OREGON  
610 SW BROADWAY STE 308  
PORTLAND OR 97205

EDWARD A FINKLEA  
CABLE HUSTON BENEDICT  
HAAGENSEN & LLOYD LLP  
1001 SW FIFTH STE 2000  
PORTLAND OR 97204

JIM ABRAHAMSON  
CADO  
4035 12TH ST CUTOFF SE STE 110  
SALEM OR 97302

TED LEHMANN  
DIREXX ENERGY  
917 SW OAK ST STE 424  
PORTLAND OR 97205

KATHERINE A McDOWELL  
STOEL RIVES LLP  
900 SW FIFTH AVE STE 1600  
PORTLAND OR 97204-1268

DANIEL W MEEK  
OF ATTYS FOR UTILITY REFORM PROJECT  
10949 SW FOURTH AVE  
PORTLAND OR 97219

JAY T WALDRON  
OF ATTYS FOR COOS COUNTY  
SCHWABE WMSON WYATT  
1211 SW FIFTH AVE STES 1600-1900  
PORTLAND OR 97204

STEVE WEISS  
NORTHWEST ENERGY COALITION  
4422 OREGON TRAIL CT NE  
SALEM OR 97305

DONALD W SCHOENBECK  
RCS INC  
900 WASHINGTON ST STE 780  
VANCOUVER WA 98660

JAMES F FELL  
STOEL RIVES LLP  
900 SW FIFTH AVE STE 2600  
PORTLAND OR 97204-1268

JUDY JOHNSON SR REV REQS ANALYST  
OPUC  
550 CAPITOL ST NE STE 215  
P O BOX 2148  
SALEM OR 97308-2148

PAULA PYRON  
NWIGU  
4113 WOLF BERRY CT  
LAKE OSWEGO OR 97035-1827

MICHAEL T WEIRICH  
ODOJ  
1162 COURT ST NE RM 100  
SALEM OR 97310-0560

PATRICK G HAGER  
PGE CO  
121 SW SALMON ST 1WTC0702  
PORTLAND OR 97204

GORDON SMITH  
OF ATTYS FOR DUKE ENERGY TRADING/MKTG  
JOHN & HENGERER  
1200 17TH NW STE 600  
WASHINGTON DC 20036

MELANIE GILLETTE  
DUKE ENERGY NORTH AMERICA  
980 9TH ST STE 1540  
SACRAMENTO CA 95814

STEVEN LOUNSBURY  
COOS COUNTY OFFICE OF LEGAL COUNSEL  
256 N BAXTER ST  
COQUILLE OR 97423

JOHN A CAMERON  
DAVIS WRIGHT TREMAINE LLP  
1300 SW FIFTH AVE STE 2300  
PORTLAND OR 97201

DATED this 15<sup>th</sup> day of August, 2005.

Respectfully submitted,

NW NATURAL

-----  
Kelley Miller, Staff Assistant  
Rates & Regulatory Affairs  
220 N.W. Second Avenue  
Portland, OR 97209-3991  
(503) 226-4211, ext. 3589  
kelley.miller@nwnatural.com