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April 3, 2019

NWN OPUC Advice No. 19-03

VIA ELECTRONIC FILING

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

Re: Rate Schedule 31 and Rate Schedule 32—Changes to Annual Winter Sales WACOG election date; and General Rules and Regulations—Housekeeping update to Pipeline definition

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff P.U.C. Or. 25¹, stated to become effective with service on and after **May 8, 2019**:

Fourth Revision of Sheet 31-2	Rate Schedule 31	Non-Residential Firm Sales and Firm Transportation Service (continued)
Second Revision of Sheet 31-3	Rate Schedule 31	Non-Residential Firm Sales and Firm Transportation Service (continued)
Fifth Revision of Sheet 32-2	Rate Schedule 32	Large Volume Non-Residential Sales and Transportation Service (continued)
Third Revision of Sheet 32-3	Rate Schedule 32	Large Volume Non-Residential Sales and Transportation Service (continued)
Fourth Revision of Sheet 00-7	General Rules and Regulations	Definitions

This filing is made in compliance with OAR 860-022-0025.

Purpose

The purpose of this filing is two-fold:

- (1) To change the annual Winter Sales weighted-average cost of gas (WACOG) election date to August 15 from September 15; and
- (2) To make a housekeeping change to update the definition of Pipeline in the definitions section of the Company's tariff.

Proposed Changes

Winter Sales WACOG election date

This proposed change will provide customers that request Winter Sales WACOG sufficient time to provide the required electric service to the Advanced Automated Meter Reading (AAMR)

¹Tariff P.U.C. Or. 25 was filed pursuant to ORS 757.205 and OAR 860-022-0005 and originated November 1, 2012 with Docket UG 221; OPUC Order No. 12-408 as supplemented by Order No. 12-437.

meter before the November 1 effective date. An AAMR meter is a required condition of service for customers electing Winter Sales WACOG in order for the Company to obtain the data necessary for billing based on a calendar-month cycle.

Over the years, NW Natural has found that it is often difficult for customers to complete the work required to comply with the condition of service to provide electric service to the AAMR device within the current limited 45-day time period.² The result has been in many cases either a delay in the effective date of the customer's elected service, or a delay in NW Natural's billing of a customer's elected service until the customer has met the condition. Neither outcome is desirable. The proposed additional 30 days should provide sufficient time for customers to fulfill this condition of service, while the timing still remains consistent with the provisions of the tariff that provide for the election date for Winter Sales WACOG occurring after the initial July 31 annual election date.

In compliance with OAR 860-022-0025, the Company states that the tariff changes proposed in this filing will affect those customers that elect the Winter Sales WACOG option; therefore the number of customers affected is not known at this time. This proposed change will not change any rates or charges, and will not change the Company's annual revenue.

Updated Pipeline definition

Currently, the Company's tariff defines Pipeline as Northwest Pipeline Corporation. NW Natural proposes to update the definition for additional pipelines that are not part of the Company's distribution system. This update is necessary to clarify that additional pipelines besides Northwest Pipeline Corporation exist that are not part of the Company's distribution system and may interconnect with the Company's system. Expanding the definition to include Coos County Pipeline, Kelso-Beaver Pipeline or other pipelines that interconnect with the Company's system will alleviate confusion and add transparency in using the Pipeline definition with other definitions and throughout the Company's tariff.

In compliance with OAR 860-022-0025, the Company states that customers will not be affected by this proposed change and there will be no change in annual revenue associated with this change. This proposed change will not change any rates or charges, and will not change the Company's annual revenue.

In accordance with ORS 757.205, copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon and on its website at www.nwnatural.com.

Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural Rates & Regulatory Affairs
220 NW Second Avenue
Portland, Oregon 97209
Telecopier: (503) 721-2516
Telephone: (503) 226-4211, ext. 3589
eFiling@nwnatural.com

² See section "Pre-Requisites to Service" in Schedules 31 and 32.

Public Utility Commission of Oregon
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Sincerely,

/s/ Natasha Siores

Natasha Siores
Manager, Regulatory Compliance

Attachments

RATE SCHEDULE 31
NON-RESIDENTIAL FIRM SALES AND FIRM TRANSPORTATION SERVICE
(continued)

GENERAL OBLIGATIONS APPLICABLE TO EACH SERVICE TYPE: (continued)

Where an AAMR device is installed and used for billing purposes, Customer must promptly restore electric power to the AAMR device following an outage, no matter the cause. If failure to restore electric power service to the AAMR device within thirty (30) days of notice from the Company can reasonably be assumed to be within the Customer's control, it is cause for the Company to reassign Customer to another Rate Schedule or another Service Type Selection that does not require an AAMR device.

Where the Customer premise is a Participant Multi-Family Building, Customer must ensure that the houseline, valves, and gas appliances installed under Schedule 405 remain in place and available for use at all times. NW Natural shall be granted free and unobstructed access to the valves installed on such houseline and shall be granted authority to place Company-owned locking devices on each valve as deemed necessary by the Company.

ANNUAL SERVICE ELECTION – July 31 Election for November 1 Service:

The Annual Service Election is the date by which a Customer may request to change all or a portion of their Service Type Selection for the following November 1 through October 31 period (PGA Year). All requests must be received by the Company on or before July 31 and will be effective the following November 1. Except as identified in this Rate Schedule under "OUT-OF-CYCLE TRANSFERS," a Customer may not make a change to their Service Type Selection at any other time.

This Annual Service Election Provision shall apply to Customer-requested changes to any or all of the following components of a Service Type Selection: (1) Service Type, (2) Commodity Component (Sales Service Types only); (3) Pipeline Capacity Charge billing option (Firm Sales Service Type only), or (4) Firm Sales Service daily delivery volumes (Combination Service Type only).

When there is no Customer requested change under this Annual Service Election provision, then for the next PGA Year commencing November 1 the Customer's Service Type and related billing options, including the Commodity Component option for Sales Service Types, will default to the same Service Type and billing options that are in effect at the close of the current Annual Service Election period.

Transfers between Sales Service and Transportation Service are further subject to the provisions in this Rate Schedule under "APPLICATION OF TEMPORARY ADJUSTMENTS TO RATES (Account 191 Adjustments)."

The Service Types available under this Rate Schedule and the required selections for each Service Type are set forth below. See "DESCRIPTION OF SERVICE TYPES AND REQUIREMENTS FOR SERVICE" in this Rate Schedule for additional information:

Sales Service Types:

Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG. The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing effective the following November 1 through March 31 period.

(C)

Firm Sales Service

Customer must select one of two Pipeline Capacity Charge options:

- i. Volumetric
- ii. MDDV

(continue to Sheet 31-3)

RATE SCHEDULE 31
NON-RESIDENTIAL FIRM SALES AND FIRM TRANSPORTATION SERVICE
(continued)

ANNUAL SERVICE ELECTION – July 31 Election for November 1 Service: (continued)

Transportation Service Type: *

Firm Transportation Service

* Customer will automatically be placed on a month-end billing cycle

Combination Service Types*:

For Sales Service, Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG (November 1 through October 31). The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing effective the following November 1 through March 31 period.

(C)

Firm Sales Service with Firm Transportation Service

- Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- Customer may specify an hourly delivery volume in their Service Election form. The total hourly delivery volume for any given 24-hour period must not exceed the total specified Firm MDDV.
* Customer will automatically be placed on a month-end billing cycle

The terms and conditions for submission and approval of a Service Type Selection are identified under "SERVICE TYPE SELECTIONS – PROCESS AND PROCEDURE" of this Rate Schedule. A Customer need not submit a Service Election Form if the Customer desires to retain its current Service Type Selection for the next PGA Year.

RATE SCHEDULE TRANSFERS:

A transfer between Rate Schedules will be allowed upon one Billing Month advance notice to the Company. Any request to also change the Service Type Selection must comply with the provision for "OUT-OF-CYCLE TRANSFERS FOR CERTAIN SERVICE TYPES" set forth in this Rate Schedule. Customer eligibility for a Rate Schedule transfer is as follows:

New Customer. A Customer with an account for gas service to the Premise to be served by this Rate Schedule that was opened within the most recent 12 calendar months may transfer to any other Rate Schedule upon appropriate advance notice. Once a transfer is made, a second transfer cannot be made from that Rate Schedule until Customer has completed a minimum of 12 consecutive Billing Months.

Existing Customer. A Customer that has fulfilled 12 months of continuous service under this Rate Schedule may voluntarily transfer to another Rate Schedule at any time upon appropriate advance notice. Once a transfer is made, a second transfer cannot be made from that Rate Schedule until Customer has completed a minimum of 12 consecutive Billing Months

(continue to Sheet 31-4)

RATE SCHEDULE 32
LARGE VOLUME NON-RESIDENTIAL SALES AND TRANSPORTATION SERVICE
(continued)**GENERAL OBLIGATIONS APPLICABLE TO EACH SERVICE TYPE:** (continued)

Where an AAMR device is installed and used for billing purposes, Customer must promptly restore electric power service to the AAMR device following an outage, no matter the cause. If failure to restore electric power to the AAMR device within thirty (30) days of notice from the Company can reasonably be assumed to be within the customer's control, it is cause for the Company to reassign Customer to another rate schedule or another Service Type Selection that does not require an AAMR device.

Where the Customer premise is a Participant Multi-Family Building, Customer must ensure that the houseline, valves, and gas appliances installed under Schedule 405 remain in place and available for use at all times. NW Natural shall be granted free and unobstructed access to the valves installed on such houseline and shall be granted authority to place Company-owned locking devices on each valve as deemed necessary by the Company.

ANNUAL SERVICE ELECTION – July 31 Election for November 1 Service:

The Annual Service Election is the date by which a Customer may request to change all or a portion of their Service Type Selection for the following November 1 through October 31 period (PGA Year). All requests must be received by the Company on or before July 31, and will be effective the following November 1. Except as identified in this Rate Schedule under "OUT-OF-CYCLE TRANSFERS," a Customer may not make a change to their Service Type Selection at any other time.

This Annual Service Election Provision shall apply to Customer-requested changes to any or all of the following components of a Service Type Selection: (1) Service Type, (2) Commodity Component (Sales Service Types only); (3) Pipeline Capacity Charge billing option (Firm Sales Service Type only), or (4) Firm Sales Service daily delivery volumes (Combination Service Type only).

When there is no Customer requested change under this Annual Service Election provision, then for the next PGA Year commencing November 1 the Customer's Service Type and related billing options, including the Commodity Component option for Sales Service Types, will default to the same Service Type and billing options that are in effect at the close of the current Annual Service Election period.

Transfers between Sales Service and Transportation Service are further subject to the provisions in this Rate Schedule under "APPLICATION OF TEMPORARY ADJUSTMENTS TO RATES (ACCOUNT 191 ADJUSTMENTS)."

The Service Types available under this Rate Schedule, and the required selections for each Service Type, are set forth below. See "DESCRIPTION OF SERVICE TYPES AND REQUIREMENTS FOR SERVICE" in this Rate Schedule for additional information:

Sales Service Type*:

Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG. The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing effective the following November 1 through March 31 period.

(C)

Firm Sales Service:

Customer must select one of two Pipeline Capacity Charge options:

- Volumetric
- MDDV

(continue to Sheet 32-3)

RATE SCHEDULE 32
LARGE VOLUME NON-RESIDENTIAL SALES AND TRANSPORTATION SERVICE
(continued)

ANNUAL SERVICE ELECTION – July 31 Election for November 1 Service: (continued)
Sales Service Type* (continued):

Interruptible Sales Service *

Transportation Service Types*:

- a. Firm Transportation Service
- b. Interruptible Transportation Service

*Customer will automatically be placed on a month-end billing cycle.

Combination Service Types*:

For Sales Service, Customer must select one of two Commodity Component options: (1) Annual Sales WACOG, or (2) Winter Sales WACOG. Customer will have until August 15 to select the Winter Sales WACOG option (for a term of November 1 through March 31). If no selection is made, the Commodity Component option will default to Annual Sales WACOG (November 1 through October 31). The Customer that selects Winter Sales WACOG will be billed at Monthly Incremental Cost of Gas (Schedule 150) effective April 1 through October 31. If no other change in Service Type was previously requested, either as an Out-of-Cycle Transfer or with this Annual Service Election, the Winter Sales WACOG Commodity Component will automatically restart for billing the following November 1 through March 31 period.

(C)

- a. Firm Sales Service with Interruptible Sales Service **
Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- b. Firm Sales Service with Firm Transportation Service
Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- c. Firm Sales Service with Interruptible Transportation Service
Customer must specify an exact daily delivery volume to be billed at Firm Sales Service
- d. Interruptible Sales with Interruptible Transportation Service
Customer must specify an exact daily delivery volume to be billed at Interruptible Sales Service
- e. Firm Transportation Service with Interruptible Transportation Service
Customer must specify an exact daily delivery volume to be billed at Firm Transportation Service

* Customer will automatically be placed on a month-end billing cycle

*** Customer must choose one Commodity Component option for all Sales Service volumes

Customer may specify an hourly delivery volume in their Service Election form. The total hourly delivery volume for any given 24-hour period must not exceed the total specified Firm MDDV.

The terms and conditions for submission and approval of a Service Type Selection are identified under "SERVICE TYPE SELECTIONS – PROCESS AND PROCEDURE" of this rate schedule. A Customer need not submit a Service Election Form if the Customer desires to retain its current Service Type Selection for the next PGA Year.

RATE SCHEDULE TRANSFERS:

A transfer between Rate Schedules will be allowed upon one Billing Month advance notice to the Company. Any request to also change the Service Type Selection must comply with the provision for "OUT-OF-CYCLE TRANSFERS FOR CERTAIN SERVICE TYPES" set forth in this Rate Schedule. Customer eligibility for a Rate Schedule transfer is as follows:

New Customer. A Customer with an account for gas service to the premise to be served by this Rate Schedule that was opened within the most recent 12 calendar months may transfer to any other Rate Schedule upon appropriate advance notice. Once a transfer is made, a second transfer cannot be made from that Rate Schedule until Customer has completed a minimum of 12 consecutive Billing Months.

(continue to Sheet 32-4)

NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Fourth Revision of Sheet 00.7
Cancels Third Revision of Sheet 00.7

GENERAL RULES AND REGULATIONS

(continued)

Definitions (continued):

OPUC. The Public Utility Commission of Oregon, also referred to as the Commission.

Overrun Entitlement. A condition whereby a Transportation Service customer is restricted to use no more than a percentage of such Customer's Confirmed Nominations on a specified Gas Day.

Participant Multi-Family Building. A Qualified Multi-Family Building where the developer received compensation under Schedule 405 for the installation of houseline piping and shut-off valves for Residential Schedule 4 use.

PGA Year. The period November 1 through October 31.

Pipeline. Northwest Pipeline Corporation, Coos County Pipeline, Kelso Beaver Pipeline, or other pipeline that interconnects with Company's Distribution System as applicable. Northwest Pipeline Corporation shall be the source for all Nomination, Confirmed Nomination, Entitlement, and Gas Day information if such information is not provided by the interconnecting pipeline.

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Pipeline Capacity Charge. A charge applicable to Sales Service Customers served under **Rate Schedule 31** and **Rate Schedule 32** that is designed to recover the cost of the delivery of natural gas from an interstate pipeline to the Company's Receipt Point.

Pre-emption. A condition wherein Transportation Customers are required to make their gas available to the Company for a price, to the extent the Company determines that it is necessary to maintain service to Customers with higher service priorities.

Premise. All of the real property and apparatus in use by a single Customer on an integral parcel of land undivided by a dedicated street, highway or other public thoroughfare or railway which comprises the site upon which Customer facilities are located and to which Natural Gas service is provided.

Purchased Gas Adjustment (PGA) Filing. The regulatory document filed with the Commission that supports the Company's request for rate changes under **Schedule P**, and for other changes to rates as the Commission may allow.

Qualified Multi-Family Building. A multi-story, multi-family buildings constructed within the Company's Oregon service territory that are three (3) or more floors with two (2) or more Residential dwelling units stacked vertically.

Qualifying Valid State or Federal Identification. Includes but is not necessarily limited to: (a) Passport; (b) U.S. Visa; (c) Military identification; (d) Immigration and Naturalization Service (INS) identification; (e) Oregon Tribal Identification; (f) Oregon Driver's License; (g) Oregon Department of Motor Vehicles (DMV) Identification. Any identification having an expired date will not be considered valid. Other forms of state or federal identification may be allowed in accordance with Company policy and procedures.

Receipt Point. The point at which gas enters Company's system from the Pipeline's interconnect. The Receipt Point may also be a point of interconnection on the Company's Distribution System that is designated for the receipt of Biomethane.

Residential Class Customer. Customers that use Natural Gas for Domestic purposes. The Residential Class includes service to single-family dwellings, separately metered apartments, condominiums or townhouses, and centrally metered multiple dwellings or apartments.

(continue to Sheet 00.8)

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