

Rates and Regulatory Affairs
Facsimile: 503.721.2516



February 13, 2009

VIA ELECTRONIC FILING

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

ATTN: Filing Center

Re: **OPUC Docket UM ____**: Application for Authorization of Deferred Accounting of
NW Natural's Industrial DSM Program Costs

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"),
files herewith the above-referenced Application for Authorization of Deferred Accounting of NW
Natural's Industrial DSM Program Costs.

Attached as support of this request is a Memorandum of Understanding (MOU)
signed by the Company, OPUC Staff, Citizens' Utility Board (CUB) and Northwest Industrial Gas
Users (NWIGU). This MOU outlines the agreed to terms and conditions related to the
Company's offering of Industrial DSM.

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 part of the
enclosed application.

Please call Jennifer Gross at (503) 226-4211 extension 3590 if you have any
questions.

Sincerely,

/s/ Inara K. Scott

Inara K. Scott
Manager, Regulatory Affairs

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of NW Natural Gas Company's)	
Application for Authorization)	APPLICATION FOR
For Deferred Accounting of Expenses)	AUTHORIZATION FOR
For Industrial Demand Side Management)	DEFERRED ACCOUNTING
Programs)	

In accordance with ORS 757.259, ORS 757.262, and OAR 860-027-0300, NW Natural Gas Company ("NW Natural" or the "Company") files this application with the Public Utility Commission of Oregon ("Commission") for an order authorizing the Company 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,¹ Industrial Interruptible Sales Customers,² and Schedule 32 Commercial Sales Customers³ ("Application").

I. INTRODUCTION

The Company currently offers DSM programs to its residential and most of its commercial customers.⁴ This Application is made in furtherance of the Company's

¹ Industrial firm customers served on the Company's Rate Schedules 3, 31, and 32.

² Industrial interruptible customers served on the Company's Rate Schedules 31 and 32.

³ Commercial customers served on Rate Schedule 32.

⁴ The Company established Residential and Commercial DSM programs in accordance with Commission Order No. 02-634, which approved the Company's Residential and Commercial 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 made sense 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

effort to expand its DSM offerings to industrial customers, as contemplated by the Commission in its recent Integrated Resource Plan (“IRP”) orders. In Order No. 05-964, the Commission acknowledged NW Natural’s 2004 IRP and directed that the Company’s next IRP “include a full assessment of cost-effective DSM potential in its service territory over the next 20-year planning period.”⁵ In addition, the Commission’s IRP guidelines require that a utility’s IRP include a conservation potential study for its entire service territory.⁶ Accordingly, in its 2008 IRP, the Company identified the potential acquisition of 22 thousand therms of cost-effective energy savings from its Industrial Firm Sales customers.⁷ These energy savings could reduce consumption of Industrial Firm Sales Customers by 570 thousand therms by 2028.⁸ The inclusion of cost-effective DSM for Schedule 32 Commercial Sales Customers and Industrial Interruptible Sales Customers will enhance the potential energy savings. The Company’s industrial DSM effort will allow the Company to pursue industrial DSM resources that are least-cost in harmony with ORS 757.262, which allows the Commission to adopt policies designed to encourage the acquisition of cost-effective conservation resources. For these reasons, the Commission should grant the Company’s request for deferral of expenses associated with developing an industrial DSM program.

II. NOTICE

NW Natural hereby waives service by means other than service by electronic mail. Consistent with that waiver, communications regarding this Application should be addressed to all of the following:

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.*

⁵ *Re NW Natural’s 2008 Integrated Resource Plan*, Docket LC 37, Order No. 05-964 at 4, 7 (Aug. 29, 2005).

⁶ *Re Investigation into Integrated Resource Planning*, Docket UM 1056, Order No. 07-047, Appendix A at 6 (Feb. 9, 2007).

⁷ *Re NW Natural’s 2008 Integrated Resource Plan*, Docket LC 45, Integrated Resource Plan at 4-7 (Apr. 15, 2008).

⁸ *Id.*

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III. DEFERRED ACCOUNTING RULE REQUIREMENTS

The following information is provided pursuant to the requirements set forth in OAR 860-027-0300(3).

A. Description of Utility Expense

In this Application, the Company is requesting to defer the costs associated with studying, planning, administering, and delivering the industrial DSM described in this Application (“Industrial DSM Program”). The Industrial DSM Program will include the acquisition of cost-effective DSM for Industrial Firm Sales Customers, in accordance with the finding in the Company’s 2008 IRP that potential savings are available for this customer class. The Energy Trust of Oregon (“Energy Trust”) will study the availability of DSM for Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers. The Energy Trust will provide DSM to Industrial Firm Sales Customers and Schedule 32 Commercial Customers to the extent it is cost-effective; the Energy Trust will also provide cost-effective DSM to Industrial Interruptible Sales Customers such that costs for this portion of the program do not exceed \$500,000 per year.

The Company and interested parties—Commission Staff, Citizens’ Utility Board, and Northwest Industrial Gas Users—have agreed as evidenced in the attached and signed Memorandum of Understanding (“MOU”) that simultaneously developing programs for Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers would prove beneficial to customers, because a larger customer base would increase energy savings and allow costs to be spread more broadly, thus reducing the impact of rates related to the Industrial DSM Program.

The Energy Trust will administer the Company’s Industrial DSM Program. The Energy Trust is a non-profit organization established in response to Oregon’s electric deregulation legislation, which requires third-party administration of independently owned electric utilities’ DSM programs.⁹ The Energy Trust currently administers NW Natural’s Residential and Commercial DSM programs.¹⁰ The Energy Trust will study the potential for DSM savings for Industrial Firm Sales, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers, and will develop, administer, and deliver NW Natural’s Industrial DSM Program.

The Company’s Industrial DSM Program complies with the stipulation adopted in Commission Order No. 05-934. That stipulation prevents the Company from charging the Schedule 301, Public Purpose Charge to industrial customers served on Schedules 3, 31, 32, and special contracts, and prevents those customers from being eligible for Energy Trust DSM programs funded by the Public Purpose Charge.¹¹ The Industrial DSM Program discussed in this Application will not be charged under

⁹ ORS 757.612(3)(c).

¹⁰ 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).

¹¹ *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).

Schedule 301. Instead, the Company will defer all costs associated with the study, development, administration, and delivery of the Industrial DSM Program for the 12-month period, March 1, 2009 through February 28, 2010, for future amortization among Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers in the Company's next annual Purchased Gas Adjustment Mechanism. The signatories to the attached MOU have agreed to support amortization of these costs to these customer classes.

B. Reasons for Deferral

The Company requests deferral of the costs associated with the study, development, administration, and delivery of the Industrial DSM Program.

ORS 757.259(2)(e) allows the deferral of utility expenses where necessary to match appropriately the costs borne by and benefits received by ratepayers. This request seeks to align the benefits customers receive from the Company's Industrial DSM Program with the costs of the program by allowing the Company to defer for later inclusion in rates the costs of the program.

C. Proposed Accounting

NW Natural proposed to account for the deferred expenses related to the Industrial DSM Program by recording the deferral in a sub-account of Account 186 (Miscellaneous Deferred Debits). In accordance with ORS 757.259(4) and Order No. 05-1070,¹² NW Natural proposes to accrue interest on the unamortized balance at the rate equal to its weighted average cost of capital most recently approved by the Commission. Ratemaking treatment of deferred amounts will be addressed in a future rate proceeding.

¹² *Re Public Utility Commission of Oregon Staff Request to Open an Investigation Related to Deferred Accounting*, Docket UM 1147, Order No. 05-1070 at 13–14 (Oct. 5, 2005).

D. Estimate of Amounts

The Company estimates the amount to be recorded in the deferred account for the 12-month period beginning March 1, 2009 through February 28, 2010 to be approximately \$900,000.

E. Notice

A copy of the Notice of Application and a list of people served with the Notice are attached to this Application as Exhibit A.

IV. CONCLUSION

NW Natural respectfully requests that, in accordance with ORS 757.259, the Commission authorize the Company to defer the expenses described in this Application.

DATED: February 13, 2009

Sincerely,

/s/ Inara K. Scott
Inara K. Scott
NW Natural Gas
Manager, Regulatory Affairs
220 NW Second Ave
Portland, Oregon 97209

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of NW Natural Gas Company's)
Application for Authorization)
For Deferred Accounting of Expenses)
For Industrial Demand Side Management)
Programs)

Memorandum of Understanding

This Memorandum of Understanding ("MOU") is entered into for the purpose of resolving the issues among the parties to this MOU related to NW Natural Gas Company's ("NW Natural" or the "Company") industrial demand side management program ("Industrial DSM Program") and funding for the Program.

PARTIES

1. The parties to this MOU are Staff of the Public Utility Commission of Oregon ("Staff"), the Citizens' Utility Board ("CUB"), the Northwest Industrial Gas Users ("NWIGU"), and NW Natural (together, the "Parties").

BACKGROUND

2. The Company currently offers DSM programs to its residential and most of its commercial sales customers.¹ The Company established residential and commercial sales DSM programs in accordance with the Stipulation adopted by the Commission in Order No. 02-634.² That Stipulation also established the Company's public purpose charge that funds the Company's residential and commercial sales DSM programs as well as low income weatherization programs.³ As agreed to by parties to both decoupling dockets (UG 143 and UG

¹ Commercial Customers served on Rate Schedule 32 were classified as Industrial customers when Order No. 02-634 was issued, so these customers are not served under the DSM programs or charged the public purpose charge required therein. See *Re NW Natural Gas Co.'s Application for Public Purposes Funding and Distribution Margin Normalization*, Docket UG 143, Order No. 02-634 at 3-4 (Sept. 12, 2002).

² Order No. 02-634 at 3-4.

³ *Id.* at 4-5.

163), industrial customers were exempt from the decoupling mechanism and the public purpose charge.⁴

3. In its most recent Integrated Resource Plan (“IRP”), NW Natural found that it could potentially save 22,000 therms of energy per year from Industrial Firm Sales Customers.⁵ The cumulative achievable savings for industrial firm sales energy efficiency programs in Oregon could reduce consumption by 540 thousand therms by 2022 and approximately 570 thousand therms by 2028.⁶ The amount of DSM that may be available to the Company on a cost-effective basis for Interruptible Sales Customers⁷ is not known because the IRP does not plan for these customers. Schedule 32 Commercial Customers were not studied as a customer class separate from other commercial customers.

4. The Parties have agreed that simultaneously developing industrial DSM programs for Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Customers would prove beneficial to customers, because a larger customer base would increase energy savings and allow costs to be spread more broadly, thus reducing the impact of rates related to industrial DSM. The Company plans to develop such a program (“Industrial DSM Program”) for these three classes of customers that is separate from the programs for residential and commercial sales customers that already exist.

5. The MOU adopted by the Commission in Order No. 05-934 prevents the Company from charging the Schedule 301, Public Purpose Charge to industrial customers served on Schedules 3, 31, and 32 and special contracts, and prevents those customers from being eligible for Energy Trust of Oregon (“Energy Trust”) funding for DSM programs.⁸ The

⁴ *Id.*; *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).

⁵ *Re NW Natural’s 2008 Integrated Resource Plan*, Docket LC 45, Integrated Resource Plan at 4-7 (April 15, 2008). Firm Industrial Sales Customers include industrial firm customers served on the Company’s Rate Schedules 3, 31, and 32.

⁶ *Id.*

⁷ Interruptible Sales Customers are industrial interruptible customers served on the Company’s Schedules 31 and 32.

⁸ *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).

Parties have entered into this MOU in part to clarify that the Stipulation adopted in Order No. 05-934 does not prevent industrial customers from participating in or being charged for the Company's Industrial DSM Program as it is delineated in this MOU.

6. The Energy Trust is a non-profit organization established in response to Oregon's electric deregulation legislation, which requires third-party administration of independently owned electric utilities' DSM programs.⁹ The Energy Trust currently administers NW Natural's residential and commercial sales DSM programs.

7. NW Natural is filing this MOU as supporting documentation to its Application for Deferred Accounting ("Application") for the costs associated with studying, planning, administering, and delivering Industrial DSM.

III. AGREEMENT

8. Using funds provided by NW Natural, the Energy Trust will provide cost effective DSM as identified in the Company's 2008 IRP to Industrial Firm Sales Customers and future analysis of DSM potential. The Energy Trust will also study the availability of DSM for Industrial Interruptible Sales Customers and Schedule 32 Commercial Sales Customers. The Energy Trust will offer DSM to Industrial Firm Sales Customers and Schedule 32 Commercial Firm Sales customers to the extent it is cost-effective; the Energy Trust will also provide cost-effective DSM to Industrial Interruptible customers for a pilot period of 2 years, at an annual cost not to exceed \$500,000.

9. The Energy Trust will develop, administer, and deliver NW Natural's Industrial DSM Program.

10. Staff, CUB, and NWIGU agree that the Commission should grant NW Natural's Application in order to appropriately align the benefits customers receive from the Company's Industrial DSM Program with the costs of the program.

⁹ ORS 757.612(3)(c).

11. NW Natural will request that the costs deferred as a result of its Application be amortized for recovery across Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers. NW Natural will request authorization to defer costs of the Industrial DSM Program each year for two years, after which time the Parties will review the success of this plan. The Parties will specifically review the inclusion of Industrial Interruptible Sales Customers and future program budgets.

12. The Parties agree to support and recommend that the Commission support NW Natural's request to recover the costs of Industrial DSM in the manner described in paragraph 11.

13. By entering into this MOU, no Party shall be deemed to have approved, admitted, or consented to the facts, principles, methods, or theories employed by any other Party in arriving at the terms of this MOU, other than those specifically identified in the body of this MOU. No Party shall be deemed to have agreed that any provision of this MOU is appropriate for resolving issues in any other proceeding, except as specifically identified in this MOU.

14. This MOU may be executed in counterparts and each signed counterpart shall constitute an original document.

This MOU is entered into by each party on the date entered below such Party's signature.

NWIGU

STAFF

By: _____

By: _____

Date: _____

Date: _____

CUB

NW NATURAL

By: _____

By: C.J. Mc

Date: _____

Date: 2/2/09

11. NW Natural will request that the costs deferred as a result of its Application be amortized for recovery across Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers. NW Natural will request authorization to defer costs of the Industrial DSM Program each year for two years, after which time the Parties will review the success of this plan. The Parties will specifically review the inclusion of Industrial Interruptible Sales Customers and future program budgets.

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NWIGU

STAFF

By: Paula E. Ayon

By: _____

Date: 2/11/09

Date: _____

CUB

NW NATURAL

By: _____

By: _____

Date: _____

Date: _____

11. NW Natural will request that the costs deferred as a result of its Application be amortized for recovery across Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers. NW Natural will request authorization to defer costs of the Industrial DSM Program each year for two years, after which time the Parties will review the success of this plan. The Parties will specifically review the inclusion of Industrial Interruptible Sales Customers and future program budgets.

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This MOU is entered into by each party on the date entered below such Party's signature.

NWIGU

STAFF

By: _____

By: Bonnie B. Jatom

Date: _____

Date: February 10, 2009

CUB

NW NATURAL

By: _____

By: _____

Date: _____

Date: _____

11. NW Natural will request that the costs deferred as a result of its Application be amortized for recovery across Industrial Firm Sales Customers, Industrial Interruptible Sales Customers, and Schedule 32 Commercial Sales Customers. NW Natural will request authorization to defer costs of the Industrial DSM Program each year for two years, after which time the Parties will review the success of this plan. The Parties will specifically review the inclusion of Industrial Interruptible Sales Customers and future program budgets.

12. The Parties agree to support and recommend that the Commission support NW Natural's request to recover the costs of Industrial DSM in the manner described in paragraph 11.

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This MOU is entered into by each party on the date entered below such Party's signature.

NWIGU

STAFF

By: _____

By: _____

Date: _____

Date: _____

CUB

NW NATURAL

By: *Bl. Adams*

By: _____

Date: 2-11-09

Date: _____

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM _____

In the Matter of NW Natural Gas Company's)	
Application for Authorization)	NOTICE OF APPLICATION
For Deferred Accounting of Expenses)	FOR DEFERRED
Programs)	ACCOUNTING

On February 13, 2009, NW Natural Gas Company ("NW Natural" or the "Company") filed an Application for Authorization of Deferred Accounting ("Application") with the Public Utility Commission of Oregon ("Commission"). Pursuant to ORS 757.259, NW Natural proposed to defer for later recovery all costs associated with studying, planning, administering, and delivering Demand Side Management programs for Industrial Firm Sales Customers,¹ Industrial Interruptible Sales Customers,² and Schedule 32 Commercial Sales Customers³ incurred by the Company beginning on January 15, 2009.

The granting of this Application will not authorize a change in rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

The Company serviced this Notice of Application on all parties to the Company's last general rate case, UG 152. Interested persons can obtain a copy of the Application by contacting:

Jennifer Gross
NW Natural
Tariff and Regulatory Compliance Consultant
220 NW Second Ave
Portland, Oregon 97209
email: jennifer.gross@nwnatural.com

¹ Industrial firm customers served on the Company's Rate Schedules 3, 31, and 32.

² Industrial interruptible customers served on the Company's Rate Schedules 31 and 32.

³ Commercial customers served on Rate Schedule 32.

Any person may submit to the Commission written comment on the Application, in accordance with procedures prescribed by the Commission. The deadline for comments on the Application is 25 days from the date of this Application.

Dated: February 13, 2009

Sincerely,

/s/ Inara K. Scott
Inara K. Scott
NW Natural
Manager, Regulatory Affairs
220 NW Second Ave
Portland, Oregon 97209



UM ____ Application for Authorization for Deferred Accounting
CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of February 2009, I served the foregoing NOTICE OF APPLICATION FOR AUTHORIZATION FOR DEFERRED ACCOUNTING upon the parties or attorneys of parties listed below by U.S. mail, postage prepaid.

UG 152 SERVICE LIST

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cooscc@co.coos.or.us

DATED at Portland, Oregon, this 13th day of February 2009.

/s/ Kelley C. Miller
Kelley C. Miller, Staff Assistant
Rates & Regulatory Affairs
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kelley.miller@nwnatural.com