

David H. Anderson
Senior Vice President and Chief Financial Officer
Telephone: 503.220.2406
Toll Free: 800.422.4012 Ext. 3306
Facsimile: 503.220.2584
Email: david.anderson@nwnatural.com



October 15, 2009

Salem Safe Room
Public Utility Commission of Oregon
550 Capitol Street N.E., Suite 215
Salem, OR 97301-2551

**Re: Docket No. UG 170
Submission of 2009 Tax Report by Northwest Natural Gas Company for
Fiscal Years 2006, 2007 and 2008**

Northwest Natural Gas Company ("NW Natural" of "the Company") hereby files its October 15, 2009 tax report (the "Report") and Tax Template (the "Template") in Public Utility of Oregon Commission ("the Commission") Docket No. UG 170 pursuant to OAR 860-022-0041, as amended by AR 517, Order No. 07-401 ("the Rules"). The Report shows for each of the fiscal years 2006, 2007, and 2008, calculated in the manner set out in the Final Rules, and using the template provided by Commission staff, the amounts of "taxes paid" by NW Natural, as compared with the amounts of taxes that NW Natural was "authorized to collect in rates".

This cover letter, which is not confidential, contains information for each year about the difference between the taxes paid and the taxes authorized to be collected in rates. An original and two courtesy copies of the attached Report and Template have been separately submitted to the Commission as "highly confidential information" under seal and Bates numbered subject to the protections set forth in the Protective Order adopted by the Commission in Order No. 06-033. Pursuant to OAR 860-022-0041(7) and Order No. 06-033, NW Natural has also submitted copies of workpapers supporting the calculations set forth in the Report as "highly confidential information" subject to the Protective Order in this docket.

Tax Report Conclusions

ORS 757.268 and OAR 860-022-0041 provide for either rate refunds or rate increases, depending on whether the "taxes paid" by a utility were lower or higher than the taxes the utility was "authorized to collect in rates." If "taxes paid" were less than the taxes the utility was "authorized to collect in rates," the Company would be required to make the rate refund of its supposed tax savings. If "taxes paid" were more than the taxes the utility was "authorized to collect in rates," the Company

would be entitled to increase its rates to recover the supposed additional tax payments.

Based on the calculations required by the Rules, in each of 2006, 2007 and 2008, NW Natural's "taxes paid" were more than the amount of federal & Oregon taxes it was "authorized to collect in rates." The total 3-year difference was \$7,330,091, broken down as follows: \$1,658,000 for 2006; \$5,480,897 for 2007; and \$191,194 for 2008. In addition, NW Natural reported that it collected \$383,941 more in local taxes in rates than it paid attributed to the 2008 tax year.

The Rules do require that, upon order of the Commission, the utility implement an automatic adjustment clause to account for the difference between "taxes paid" and taxes the utility was "authorized to collect in rates" for the 2006, 2007 and 2008 tax years (OAR 860-022-0041(8)). For the 2006 tax year, Commission staff approved our filing and we collected the \$1,658,000 surcharge in a one-time adjustment in June 2008. For the 2007 tax year, Commission staff approved our filing and we collected the \$5,480,897 in a one-time adjustment in June 2009. Upon order by the Commission, NW Natural will be required to implement a tariff to collect the \$191,194 difference calculated for 2008.

For the 2008 tax year, the Company intends to apply the surcharge under its approved Tariff Schedule 161 "Automatic Adjustment for Utility Tax", which calls for a one-time adjustment for June 2010. The June 2010 allows the SB 408 surcharge to be off-set by a bill credit applied pursuant to the Company's Tariff Schedules 185 and 186.

We have prepared the attached Report based on what we believe is a reasonable interpretation of the Rules and tax report template provided by Commission staff. We look forward to working closely with Commission staff in their review of this Report.

Sincerely,

/s/ David H. Anderson

David H. Anderson
Senior Vice President

Attachments (Submitted separately and designated as Highly Confidential
Information Pursuant to Order No. 06-033)

cc: Portland Safe Room



CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of October, 2009, I served the foregoing Northwest Natural's HIGHLY CONFIDENTIAL 2009 Tax Report – Cover Letter Only in OPUC Docket No. UG 170 upon each party or attorneys' of parties listed below by e-mail and, where paper service is not waived, by first-class U.S. Mail, postage prepaid.

/s/ Kelley C. Miller
Kelley C. Miller, Staff Assistant
Rates & Regulatory Affairs
NW NATURAL
220 NW Second Avenue
Portland, Oregon 97209-3991
1.503.226.4211, extension 3589

OPUC DOCKET NO. UG 170

EDWARD A FINKLEA W ENERGY ACTION NORTHWEST PO BOX 8308 PORTLAND OR 97207 efinklea@energyactionnw.org	CHAD M STOKES W CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW 5TH – STE 2000 PORTLAND OR 97204 cstokes@cablehuston.com
G. CATRIONA MCCracken W CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 catriona@oregoncub.org	OPUC DOCKETS W CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 dockets@oregoncub.org
ROBERT JENKS W CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 bob@oregoncub.org	GORDON FEIGNER W CITIZENS' UTILITY BOARD OF OREGON 610 SW BROADWAY - STE 308 PORTLAND OR 97205 gordon@oregoncub.org
DANIEL W MEEK ATTORNEY AT LAW 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net	DAVID HATTON DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 david.hatton@state.or.us
LINDA K WILLIAMS KAFOURY & MCDUGAL 10266 SW LANCASTER RD PORTLAND OR 97219-6305 linda@lindawilliams.net	PAULA E PYRON W NORTHWEST INDUSTRIAL GAS USERS 4113 WOLF BERRY CT LAKE OSWEGO OR 97035-1827 ppyron@nwigu.org
MARCUS A WOOD STOEL RIVES LLP 900 SW FIFTH AVE – STE 2600 PORTLAND OR 97204	