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May 16, 2011

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 1101 - Application for Reauthorization for Deferred Accounting of Intervenor Funding Grants

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), hereby electronically files the above-referenced Application for Reauthorization for Deferred Accounting of Intervenor Funding Grants. The requisite original will follow in today's U.S. mail.

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.

If you have any questions, please call me at (503) 226-4211, extension 3590.

Sincerely,

/s/ Jennifer Gross

Jennifer Gross

enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

DOCKET NO. UM 1101

In the Matter of the Application of
NORTHWEST NATURAL GAS COMPANY,
dba NW NATURAL, for reauthorization to defer
expenses for Intervenor Funding Grants.

**APPLICATION OF
NW NATURAL**

In accordance with ORS 757.259 and OAR 860-027-0300, NW Natural (or the “Company”) files this application with the Public Utility Commission of Oregon (the “Commission”) requesting an order re-authorizing the Company to record and defer the cost of intervenor funding grants provided to qualifying organizations pursuant to the provisions of ORS 757.259(3), as amended by Oregon Laws 2003, chapter 234 (“Intervenor Funding Grants”) for future amortization in rates. This request is for the period July 1, 2011, through June 30, 2012.

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, which empowers the Commission to authorize the deferral of expenses or revenues of a public utility for later incorporation in rates.

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3. Communications

NW Natural hereby waives paper service in this docket. Please direct communications regarding this Application to:

Jennifer Gross
Rates & Regulatory Affairs
NW Natural
220 NW Second Avenue
Portland, OR 97209-3991
Telephone: (503) 226-4211, extension 3590
Facsimile: (503) 721-2516
E-mail: jennifer.gross@nwnatural.com

and

Rates & Regulatory Affairs
NW Natural
220 NW Second Avenue
Portland, OR 97209-3991
E-mail: eFiling@nwnatural.com

4. Basis for Application

Statutory Authority

On June 6, 2003, the Governor signed Oregon Laws 2003, chapter 234 (formerly known as Senate Bill 205, the "Intervenor Funding Act") into law (ORS 757.259). Section 2 of the Intervenor Funding Act authorizes the Commission to approve written agreements for intervenor funding grants between electric and natural gas utilities and qualifying organizations representing broad customer interests. Such grants would be used by these qualifying organizations when participating in certain types of regulatory proceedings before the Commission. Section 2 of the Intervenor Funding Act also authorizes the Commission to establish rules with respect to funding agreements for determining which organizations are eligible for financial assistance, the amount of assistance that may be provided, the manner in which assistance will be distributed, and other necessary administrative matters.

Moreover, Section 2 of the Intervenor Funding Act provides:

“The commission shall allow a public utility that provides financial assistance under this section to recover the amounts so provided in rates. The commission shall allow a public utility to defer inclusion of those amounts in rates as provided in ORS 757.259 if the public utility so elects.”

ORS 757.259(3), as amended by section 3 of the Intervenor Funding Act, provides:

“Upon request of the public utility, the commission by order shall allow deferral of amounts provided as financial assistance under an agreement entered into under section 2 of this 2003 Act for later incorporation in rates.”

Additionally, the Company notes that deferred amounts under ORS 757.259(3) are not subject to the percentage of gross revenues limitation on amortization or other provisions of subsections (5), (6), (7), and (8) of the amended section.

Commission Approval of the Intervenor Funding Agreement

On December 19, 2007, the Commission issued Order No. 07-564, which approved amendments to the original Intervenor Funding Agreement previously approved in Order No. 03-338. The parties to this amended Intervenor Funding Agreement are Portland General Electric Company, PacifiCorp, Cascade Natural Gas Corporation, Avista Corporation, Industrial Customers of Northwest Utilities (ICNU), Citizens' Utility Board of Oregon (CUB), and Northwest Industrial Gas Users (NWIGU). The Intervenor Funding Agreement sets forth the amount of funding to be contributed by each utility and the procedures for budget submittals by intervenors, Commission approval of budgets, and the payment of grants by utilities. In Order No. 09-012, the Commission directed the utilities to pay to CUB the amounts made available for the CUB Fund Grants as defined and provided for in the Intervenor Funding Agreement (\$57,500 for NW Natural). Express Commission approval for payment was necessitated by Section 7.1 of the Intervenor Funding Agreement, which provides that “upon request by CUB, the Commission will direct the Participating Public Utilities to pay the amounts made available for CUB Fund Grants. . . ”

5. OAR 860-027-0300(3)(a) - Description of Utility Expense for which deferred accounting is requested.

In accordance with the statutory authority provided by ORS 757.259(3), as amended, and the Commission's approval of the Intervenor Funding Agreement, NW Natural proposes to record and defer the amount of its payment to CUB as directed by Commission Order No. 09-012. Additionally, the Company proposes to record and defer, on an ongoing basis, any and all Intervenor Funding Grants as defined and provided for in the Intervenor Funding Agreement, for later incorporation in rates. The Company will record and defer these ongoing costs upon payment of the Intervenor Funding Grants following the Commission's approval of the Intervenor Funding Grant and issuance of an Order directing the Company to make payment, pursuant to the Intervenor Funding Agreement.

6. OAR 860-027-0300(3)(b) The reason deferred accounting is being requested.

This request is made in accordance ORS 757.259(3) that allows for the deferral of Intervenor funds, and Commission Order 11-010 which directs NW Natural to pay to CUB the amounts made available for the CUB Fund Grants as defined and provided for in the Intervenor Funding Agreement (\$57,500 for NW Natural).

7. OAR 860-027-0300(3)(c) The account proposed for recording the amounts in the absence of deferred accounting.

NW Natural proposes to record payment of Intervenor Funding Grants in a subaccount of Account 186. In the absence of the Commission's approval of this Application, the Company would not incur the cost of Intervenor Funding Grants. Were such costs incurred, however, they would be recorded in an appropriate sub-account of FERC Account 401.

8. OAR 860-027-0300(3)(d) Amounts Subject to Deferral

NW Natural anticipates that the maximum amounts to be deferred during the 12-month period subsequent to the Application are:

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	<u>Fund</u>
CUB Fund	\$ 57,500
Preauthorized Matching Fund	\$ 57,500
Issue Fund	<u>\$ 57,500</u>
Total	<u>\$172,500</u>

For the 12-month period covered by this Application, NW Natural anticipates that the amount subject to this deferral will not exceed \$172,500. However, the Intervenor Funding Agreement permits under certain circumstances for an advance of funds that would otherwise be available in future years, or for the rollover of unused funds from a previous year for Intervenor Funding Grants from the CUB Fund and the Preauthorized Matching Fund. If an advance is made under the applicable provision of the Intervenor Funding Agreement, or grants are made based on available rollover funds, the maximum annual amounts of Intervenor Funding Grants from the CUB Fund or the Preauthorized Grant Fund could exceed the level specified in this paragraph in which case the amount deferred under this Application could exceed \$172,500.

9. OAR 860-027-0300(4)(a) A description and explanation of the entries in the deferred account to date of the application for reauthorization.

Attached to this application are work papers detailing the amounts deferred to-date under UM 1101.

10. Requirements per Commission Order No. 09-263

Below is the information required per Commission Order No. 09-263, issued in Docket UM-1286, Staff's Investigation into Purchased Gas Adjustment Mechanisms:

- a. A completed Summary Sheet, the location in the PGA filing, and an account map that highlights the transfer of dollars from one account to another**

Exhibit A provides the Summary Sheets which show the amounts deferred. Exhibit A will be included in the 2011 PGA filing work papers and in the electronic file entitled "Proposed Temps Oregon 2011-12 PGA filing.xls."

b. The effective date of the deferral

This application is for the 12-month period beginning July 1, 2011 and ending June 30, 2012.

c. Prior year Order Number approving the deferral

Approval to defer costs associated with intervenor funding was last granted under Commission Order No. 10-284.

d. The amount deferred last year.

	Issue Fund Acct 186284	CUB Fund Acct 186276	Matching Fund Acct 186278
Deferred amounts July 1, 2010 through March 31, 2011	\$0	\$57,500	\$0

e. The amount amortized last year

	CUB Fund Acct 186286	Matching Fund Acct 186288
Amortized amounts November 1, 2010 through March 31, 2011 with interest	\$39,042	\$0

f. The interest rate that will apply to the accounts

The interest rate for deferral accounts is 8.618%.

g. An estimate of the upcoming PGA-period deferral and / or amortization

The Company estimates that it will seek to amortize the amounts in item 4 above in the 2011 PGA filing.

WHEREFORE, NW Natural respectfully requests that in accordance with ORS 757.259(3), as amended, the Commission authorize the Company to record and defer, on an ongoing basis and commencing as of the date of this filing, Intervenor Funding Grants incurred by the Company pursuant to the Intervenor Funding Agreement, as described in this Application.

DATED this 16th day of May, 2011.

/s/ Jennifer Gross

Jennifer Gross
Rates & Regulatory Affairs
NW Natural
220 NW Second Avenue
Portland, Oregon 97209
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May 16, 2011

**NOTICE OF APPLICATION FOR A DEFERRED ACCOUNTING ORDER
REGARDING INTERVENOR FUNDING GRANTS**

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 a deferred accounting order regarding Intervenor Funding Grant expenses. Copies of the Company's Application are available for inspection at its main office.

This is not a rate case. The purpose of this Notice is to inform parties that participated in the Company's most recent general rate case, UG 152, that the Application was filed.

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: Jennifer Gross
220 NW Second Ave
Portland, Oregon 97209-3991
Telephone: (503) 226-4211 x3590**

**Public Utility Commission
of Oregon
Attn: Filing Center
550 Capitol St, NE, Ste 215
P O Box 2148
Salem, Oregon 97308-2148
Telephone: (503) 373-0886**

Any person may submit to the Commission written comments on this matter no sooner than 25 days from the date of this Application. 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.

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER EXPENSES FOR INTERVENOR FUNDING GRANTS upon all parties who participated in the Company's most recent general rate case (UG 152) by U.S. mail, postage prepaid, or where paper service is waived, by electronic mail.

UG 152

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PORTLAND OR 97204-3795

DATED at Portland, Oregon, this 16th day of May 2011

/s/ Kelley C. Miller
Kelley C. Miller
Rates & Regulatory Affairs
NW NATURAL
220 NW Second Avenue
Portland, Oregon 97209-3991
1.503.226.4211, extension 3589
kelley.miller@nwnatural.com

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of Intervenor Funding - ISSUE FUND
 Account Number: 186284
 Docket UM 1101
 Last order for reauthorization was Order No. 10-284

Interest is not applied to this account

1 Debit (Credit)

2
3

4	Month/Year	Note	Deferral-CUB	Deferral-NWIGU	Transfers-CUB	Transfers-NWIGU	Interest	Activity	Balance-CUB	Balance-NWIGU	Balance Grand Total
5	(a)	(b)	(c1)	(c2)	(d1)	(d2)	(e)	(f)	(g1)	(g2)	(gtotal)
6					to 186286	to 186288					
7	Beginning Balance				amort account	amort account					
48	Jan-10						N/A	0.00	0.00	0.00	0.00
49	Feb-10						N/A	0.00	0.00	0.00	0.00
50	Mar-10						N/A	0.00	0.00	0.00	0.00
51	Apr-10						N/A	0.00	0.00	0.00	0.00
52	May-10						N/A	0.00	0.00	0.00	0.00
53	Jun-10						N/A	0.00	0.00	0.00	0.00
54	Jul-10						N/A	0.00	0.00	0.00	0.00
55	Aug-10						N/A	0.00	0.00	0.00	0.00
56	Sep-10						N/A	0.00	0.00	0.00	0.00
57	Oct-10						N/A	0.00	0.00	0.00	0.00
58	Nov-10						N/A	0.00	0.00	0.00	0.00
59	Dec-10						N/A	0.00	0.00	0.00	0.00
60	Jan-11						N/A	0.00	0.00	0.00	0.00
61	Feb-11						N/A	0.00	0.00	0.00	0.00
62	Mar-11						N/A	0.00	0.00	0.00	0.00

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64 **History truncated for ease of viewing**

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66 NOTES

67 1 - Transfer to CUB Amortization account 186286 or NWIGU Amortization account 186288

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Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of CUB Intervenor Funding
 Account Number: 186276
 Docket UM 1101
 Last order for reauthorization was Order No. 10-284

Interest is not applied to this account

1 Debit (Credit)

2

3

4	Month/Year	Note	Deferral	Transfers	Interest	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)

6

7 Beginning Balance

48	Jan-10		57,500.00		N/A	57,500.00	57,500.00
49	Feb-10		0.00		N/A	0.00	57,500.00
50	Mar-10		0.00		N/A	0.00	57,500.00
51	Apr-10		0.00		N/A	0.00	57,500.00
52	May-10		0.00		N/A	0.00	57,500.00
53	Jun-10		0.00		N/A	0.00	57,500.00
54	Jul-10		0.00		N/A	0.00	57,500.00
55	Aug-10		0.00		N/A	0.00	57,500.00
56	Sep-10		0.00		N/A	0.00	57,500.00
57	Oct-10		0.00		N/A	0.00	57,500.00
58	Nov-10		0.00	(57,500.00)	N/A	(57,500.00)	0.00
59	Dec-10		0.00		N/A	0.00	0.00
60	Jan-11		57,500.00		N/A	57,500.00	57,500.00
61	Feb-11		0.00		N/A	0.00	57,500.00
62	Mar-11		0.00		N/A	0.00	57,500.00

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64 **History truncated for ease of viewing**

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66 NOTES

67 1 - Transfer to Amortization account 186286

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Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of CUB Intervenor Funding
 Account Number: 186286

1	Debit	(Credit)						
2								
3						Interest		
4	Month/Year	Note	Amortization	Transfers	Interest	rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
6								
7	Beginning Balance							
52	Jan-10		(13,204.15)		94.67	2.05%	(13,109.48)	48,906.59
53	Feb-10		(9,267.30)		75.63	2.05%	(9,191.67)	39,714.92
54	Mar-10		(7,967.20)		61.04	2.05%	(7,906.16)	31,808.76
55	Apr-10		(7,518.98)		47.92	2.05%	(7,471.06)	24,337.70
56	May-10		(5,450.91)		36.92	2.05%	(5,413.99)	18,923.71
57	Jun-10		(3,939.35)		28.96	2.05%	(3,910.39)	15,013.32
58	Jul-10		(2,305.30)		23.68	2.05%	(2,281.62)	12,731.70
59	Aug-10		(1,708.31)		20.29	2.05%	(1,688.02)	11,043.68
60	Sep-10		(1,911.25)		17.23	2.05%	(1,894.02)	9,149.66
61	Oct-10		(2,595.71)		13.41	2.05%	(2,582.30)	6,567.36
62	Nov-10	old rates 1	(3,023.97)		8.64	2.05%	(3,015.33)	3,552.03
63		new rates	(2,079.73)	57,500.00	96.45	2.24%	55,516.72	59,068.75
64	Dec-10		(9,224.33)		101.65	2.24%	(9,122.68)	49,946.07
65	Jan-11		(10,746.74)		83.20	2.24%	(10,663.54)	39,282.53
66	Feb-11		(8,448.52)		65.44	2.24%	(8,383.08)	30,899.45
67	Mar-11		(8,939.13)		49.34	2.24%	(8,889.79)	22,009.66

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 69 **History truncated for ease of viewing**

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 71 **NOTES**

72 1 - Transfer from CUB Deferral account 186276 and Issue Fund Deferral account 186284

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of NWIGU Intervenor Funding
 Account Number: 186278
 Docket UM 1101
 Last order for reauthorization was Order No. 10-284

Interest is not applied to this account

1 Debit (Credit)

2

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4	Month/Year	Note	Deferral	Transfers	Interest	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
48	Jan-10		0.00		N/A	0.00	993.20
49	Feb-10		0.00		N/A	0.00	993.20
50	Mar-10		0.00		N/A	0.00	993.20
51	Apr-10		676.57		N/A	676.57	1,669.77
52	May-10		0.00		N/A	0.00	1,669.77
53	Jun-10		0.00		N/A	0.00	1,669.77
54	Jul-10		0.00		N/A	0.00	1,669.77
55	Aug-10		0.00		N/A	0.00	1,669.77
56	Sep-10		0.00		N/A	0.00	1,669.77
57	Oct-10		0.00		N/A	0.00	1,669.77
58	Nov-10	1	0.00	(1,669.77)	N/A	(1,669.77)	0.00
59	Dec-10		0.00		N/A	0.00	0.00
60	Jan-11		0.00		N/A	0.00	0.00
61	Feb-11		0.00		N/A	0.00	0.00
62	Mar-11		0.00		N/A	0.00	0.00

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65 **History truncated for ease of viewing**

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67 NOTES

68 1 - Transfer to Amortization account 186288

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Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of NWIGU Intervenor Funding
 Account Number: 186288

1	Debit	(Credit)						
2								
3						Interest		
4	Month/Year	Note	Amortization	Transfers	Interest	rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(e2)	(f)	(g)
6								
7	Beginning Balance							
37	Jan-10		(918.76)		12.46	2.23%	(906.30)	6,257.06
38	Feb-10		(826.31)		10.86	2.23%	(815.45)	5,441.61
39	Mar-10		(911.90)		9.27	2.23%	(902.63)	4,538.98
40	Apr-10		(857.53)		7.64	2.23%	(849.89)	3,689.09
41	May-10		(839.02)		6.08	2.23%	(832.94)	2,856.15
42	Jun-10		(793.26)		4.57	2.23%	(788.69)	2,067.46
43	Jul-10		(781.66)		3.12	2.23%	(778.54)	1,288.92
44	Aug-10		(781.31)		1.67	2.23%	(779.64)	509.28
45	Sep-10		(782.11)		0.22	2.23%	(781.89)	(272.61)
46	Oct-10		(857.25)		(1.30)	2.23%	(858.55)	(1,131.16)
47	Nov-10 old rates		(33.58)		(2.13)	2.23%	(35.71)	(1,166.87)
48	new rates 1		0.00	1,669.77	0.00	0.00%	1,669.77	502.90
49	Dec-10		0.00		0.00	0.00%	0.00	502.90
50	Jan-11		0.00		0.00	0.00%	0.00	502.90
51	Feb-11		0.00		0.00	0.00%	0.00	502.90
52	Mar-11		0.00		0.00	0.00%	0.00	502.90

History truncated for ease of viewing

NOTES

1 - Transfer from NWIGU Deferral account 186278 and Issue Fund Deferral account 186284. Amount from 2010 will just be held here until NWIGU funds contributed are of size to create a rate increment in the future.