



250 SW Taylor Street  
Portland, OR 97204

503-226-4211  
nwnatural.com

June 24, 2021

**VIA ELECTRONIC FILING**

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

**RE: UM 1101: Application for Reauthorization to Defer Certain Expenses or Revenues for Intervenor Funding Grants**

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), hereby electronically files the above-referenced Application for Reauthorization to Defer Certain Expenses or Revenues pursuant to provisions of ORS 757.259 for Intervenor Funding Grants.

A notice concerning this Application will be sent to all parties who participated in the Company's last general rate case, UG 388. A copy of the notice and a certificate of service are attached to the application.

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

eFiling  
Rates & Regulatory Affairs  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
Phone: (503) 610-7330  
Fax: (503) 220-2579  
eFiling@nwnatural.com

If you have any questions, please call me at (503) 610-7051.

Sincerely,

*/s/ Kyle Walker, CPA*

Kyle Walker, CPA  
Rates/Regulatory Manager

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1101**

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, dba, NW NATURAL

For Reauthorization to Defer Certain  
Expenses or Revenues Pursuant to ORS  
757.259

**Application**

1           In accordance with ORS 757.259 and OAR 860-027-0300, Northwest Natural  
2 Gas Company (“NW Natural” or the “Company”) files this application with the Public  
3 Utility Commission of Oregon (the “Commission”) requesting an order reauthorizing the  
4 Company to record and defer the cost of intervenor funding grants provided to qualifying  
5 organizations pursuant to the provisions of ORS 757.259(3) for future amortization in  
6 rates. This request is for the period July 1, 2021, through June 30, 2022.

7           In support of this Application, NW Natural states:

8   **A.    NW Natural.**

9           NW Natural is a public utility in the State of Oregon and is subject to the  
10 jurisdiction of the Commission regarding rates, service, and accounting practices. NW  
11 Natural provides retail natural gas service in the States of Oregon and Washington.

12   **B.    Statutory Authority.**

13           ORS 757.072(2) authorizes the Commission to approve written agreements for  
14 intervenor funding grants between electric and natural gas utilities and qualifying  
15 organizations representing broad customer interests. Such grants are used by these  
16 qualifying organizations when participating in regulatory proceedings before the

1 Commission. ORS 757.072(3) authorizes the Commission to establish rules with  
2 respect to funding agreements for determining which organizations are eligible for  
3 financial assistance, the amount of assistance that may be provided, the manner in  
4 which assistance will be distributed, and other necessary administrative matters.

5 Moreover, ORS 757.072(4) provides:

6 “The commission shall allow a public utility that provides  
7 financial assistance under this section to recover the  
8 amounts so provided in rates. The commission shall allow a  
9 public utility to defer inclusion of those amounts in rates as  
10 provided in ORS 757.259 if the public utility so elects.”  
11

12 ORS 757.259(3) provides:

13 “Upon request of the public utility, the commission by order  
14 shall allow deferral of amounts provided as financial  
15 assistance under an agreement entered into under ORS  
16 757.072 for later incorporation in rates.”  
17

18 Additionally, the Company notes that deferred amounts under ORS 757.259(3) are not  
19 subject to the percentage of gross revenues limitation on amortization or other  
20 provisions of subsections (5), (6), (7), (8), or (10) of ORS 757.259.

21 **C. Background of Request for Reauthorization.**

22 On July, 2, 2003, pursuant to Section 2 of the Intervenor Funding Act, the  
23 Commission issued Order No. 03-388, which, among other things, approved the  
24 Intervenor Funding Agreement among NW Natural, Portland General Electric,  
25 PacifiCorp, Cascade Natural Gas Corporation, Avista Corporation, Industrial Customers  
26 of Northwest Utilities (“ICNU”), Citizens’ Utility Board (“CUB”), Northwest Industrial Gas  
27 Users (“NWIGU”) (collectively referred to hereafter as “Joint Parties”), dated February 5,  
28 2003. The Intervenor Funding Agreement set forth the amount of funding to be  
29 contributed by each utility and the procedures for budget submittals by intervenors,

1 Commission approval of budgets, and the payment of grants by utilities. It also  
2 established the three funds from which “Intervenor Funding Grants” can be made: CUB  
3 Fund, Preauthorized Matching Fund (hereinafter also referred to as the “NWIGU Fund,”  
4 because it was for the exclusive use of NWIGU when applicable to NW Natural) and  
5 Issue Fund.

6 In its subsequent Order No. 03-405, the Commission directed the utilities to pay  
7 CUB the amount made available for the CUB Fund Grants as defined and provided for  
8 in the Intervenor Funding Agreement. Express Commission approval for payment was  
9 necessitated by Section 7.1 of the Intervenor Funding Agreement, which provides that  
10 “upon request by CUB, the Commission will direct the Participating Public Utilities to pay  
11 the amounts made available for the CUB Fund.”

12 On December 29, 2007, the Commission issued Order No. 07-564, which  
13 approved amendments to the Intervenor Funding Agreement previously approved in  
14 Order No. 03-388. In 2012, Joint Parties executed a Second Amended and Restated  
15 Intervenor Funding Agreement which the Commission approved in Order No. 12-452.  
16 This Second Amended and Restated Intervenor Funding Agreement, effective January  
17 1, 2013, through December 31, 2017, increased the CUB Fund, the Preauthorized  
18 Matching Fund (NWIGU Fund), and the Issue Fund by 15 percent above the levels  
19 allowed in prior years. The Commission approved the Third Amended and Restated  
20 Intervenor Funding Agreement, effective August 1, 2015 through December 31, 2017, in  
21 Order No. 15-335. The amended Intervenor Funding Agreement increased the Issue  
22 Fund amount for NW Natural and for Avista Utilities. NW Natural’s Issue Fund amount  
23 was changed from \$66,125 to \$143,750.

1           The Commission approved the Fourth Amended and Restated Intervenor  
2 Funding Agreement, effective January 1, 2018 through December 31, 2022, in Order  
3 No. 18-017. The amended Intervenor Funding Agreement increased the total funds  
4 available annually in the CUB Fund by approximately 45 percent, and increased the  
5 total funds available annually in the Preauthorized Matching Funds (NWIGU Fund) by  
6 approximately 10 percent. In addition, for each Preauthorized Matching Fund (NWIGU  
7 Fund), the annual amount for each calendar year after 2018 and during the term of the  
8 agreement increases by 3 percent annually. The agreement now allows the Alliance of  
9 Western Energy Consumers (“AWEC”)<sup>1</sup> to request payment of Preauthorized Matching  
10 Fund Grants semi-annually, and lowers the matching amount of internal resources or  
11 outside funding from 50 percent to 35 percent.

12 **D.     Communications.**

13           Communications regarding this Application should be addressed to:

14           NW Natural  
15           eFiling for Rates & Regulatory Affairs  
16           250 SW Taylor Street  
17           Portland, Oregon 97204  
18           Phone: (503) 610-7330  
19           Fax: (503) 220-2579  
20           Email: eFiling@nwnatural.com;

21  
22           Ryan Sigurdson (OSB #201722)  
23           Regulatory Attorney  
24           250 SW Taylor Street  
25           Portland, Oregon 97204  
26           Phone: (503) 610-7570  
27           Email: ryan.sigurdson@nwnatural.com;

28  
29           and

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<sup>1</sup> ICNU and NWIGU have merged their organizations and are now AWEC, and the NWIGU Fund now is called the “AWEC Fund.”

1 Kyle Walker, CPA  
2 Rates/Regulatory Manager  
3 250 SW Taylor Street  
4 Portland, Oregon 97204  
5 Phone: (503) 610-7051  
6 Email: kyle.walker@nwnatural.com

7 **E. Description of the Expenses or Revenues for which Deferred Accounting is**  
8 **Requested – OAR 860-027-0300(3)(a).**

9 In accordance with the statutory authority provided by ORS 757.259(3), and the  
10 Commission’s approval of the Fourth Amended and Restated Intervenor Funding  
11 Agreement, NW Natural proposes to record and defer the amount of its payment to  
12 CUB as directed by Commission Order No. 18-017. The request is pursuant to the  
13 terms of the Fourth Amended and Restated Intervenor Funding Agreement, approved  
14 by the Commission in Order No. 18-017.

15 Additionally, the Company proposes to record and defer, on an ongoing basis,  
16 any and all Intervenor Funding Grants as defined and provided for in the Fourth  
17 Amended and Reinstated Intervenor Funding Agreement, for later incorporation in rates.  
18 The Company will record and defer these ongoing costs upon payment of the Intervenor  
19 Funding Grants following the Commission’s approval of the Intervenor Funding Grant  
20 and issuance of an Order directing the Company to make payment, pursuant to the  
21 Fourth Amended and Restated Intervenor Funding Agreement.

22 **F. Reasons for Application for Reauthorization of Deferred Accounting – OAR**  
23 **860-027-0300(3)(b).**

24 This request is made in accordance with ORS 757.259(3) that allows for the  
25 deferral of Intervenor funds, and Commission Order No. 18-017 in docket UM 1929,  
26 which directs NW Natural to pay CUB the amounts made available for the CUB Fund

1 Grants as defined and provided for in the Fourth Amended and Restated Intervenor  
2 Funding Agreement (\$101,125 for NW Natural).

3 **G. Accounting – OAR 860-027-0300(3)(c).**

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

9 **H. Estimated Accounts Subject to Deferral – OAR 860-027-0300(3)(d).**

10 Under the current agreement, the estimated amounts for 2021 are displayed in  
11 the table below. The estimated amounts of the Preauthorized Matching Fund (AWEC  
12 Fund) will increase by three percent in 2021:

	<u>Fund</u>
CUB Fund	\$ 101,125
Preauthorized Matching Fund (AWEC Fund)	\$ 79,483
Issue Fund	<u>\$ 143,750</u>
Total	<u>\$ 324,358</u>

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

15 Attached as Exhibit A to this application are work papers detailing the amounts  
16 deferred to date under UM 1101.

1 **J. Reasons for Continued Deferral – OAR 860-027-0300(4)(b).**

2 The deferral is forecasted to continue as long as the Commission amends the  
3 Intervenor Funding Agreement which expires December 31, 2022.

4 **K. Requirement per Commission Order No. 09-263.**

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

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

10 Exhibit A provides the Summary Sheets which show the amounts deferred.

11 Exhibit A will be included in the 2021 PGA filing work papers and in the  
12 electronic file entitled "Proposed Temps Oregon 2021-22 PGA filing.xls."

- 13 **2. The effective date of the deferral.**

14 This application is for the 12-month period beginning July 1, 2021 and ending  
15 June 30, 2022.

- 16 **3. Prior year Order Number approving the deferral.**

17 Approval to defer costs associated with intervenor funding was last granted  
18 under Commission Order No. 20-258.

- 19 **4. The amount deferred last year.**

	<b>Issue Fund</b>	<b>CUB Fund</b>	<b>AWEC Fund</b>
	<u>Acct 186284</u>	<u>Acct 186276</u>	<u>Acct 186278</u>
Deferred amounts July 1, 2020 through May 31, 2021	136,123	\$101,125	\$11,081



1           **5. The amount amortized last year.<sup>2</sup>**

	<b>CUB Fund</b>	<b>AWEC Fund</b>
	<u>Acct 186286</u>	<u>Acct 186288</u>
Amortized amounts November 1, 2019 through May 31, 2020 with interest	\$81,177	\$16,253

2           **6. The interest rate that will apply to the accounts.**

3           While the Company does not currently accrue interest on balances deferred  
4           for intervenor funding, the Company is authorized to include carrying costs in  
5           accordance with Section 7.9 of the Second Amended and Restated  
6           Agreement included as attachment A to Commission Order No. Order No. 12-  
7           452.

8           **7. An estimate of the upcoming PGA-period deferral and/or amortization.**

9           The Company estimates that it will defer, and ultimately seek to amortize, up  
10          to \$324,358.

11       **L. Notice – OAR 800-027-0300(6).**

12          A notice of this Application has been served on all parties who participated in the  
13       Company’s last general rate case, UG 388, and is attached to this Application.

14          NW Natural respectfully requests that in accordance with ORS 757.259(3), as  
15       amended, the Commission authorize the Company to record and defer Intervenor  
16       Funding Grants incurred by the Company pursuant to the Intervenor Funding  
17       Agreement, as described in this Application.

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<sup>2</sup> For purposes of amortization, the amount of the Issue Fund deferred related to CUB is amortized in the CUB Fund and the amount of the Issue Fund deferred related to AWEC is amortized in the AWEC Fund.

1 DATED this 24<sup>th</sup> day of June 2021.

2 Respectfully Submitted,

3 NW NATURAL

4 /s/ Kyle Walker, CPA  
5 Kyle Walker, CPA  
6 Rates/Regulatory Manager

7 /s/ Ryan Sigurdson  
8 Ryan Sigurdson (OSB #201722)  
9 Regulatory Attorney  
10 250 SW Taylor Street  
11 Portland, Oregon 97204  
12 Phone: (503) 610-7570  
13 Email: ryan.sigurdson@nwnatural.com  
14

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Deferral of Intervenor Funding - ISSUE FUND  
 Account Number: 186284  
 Docket UM 1101  
 Last deferral reauthorization was approved in Order No. 20-258

1	Debit	(Credit)									
2											
3											
4	Month/Year	Note	Deferral-CUB	Deferral-AWEC	Transfers-CUB	Transfers-AWEC	Interest (1)	Activity	Balance-CUB	Balance - AWEC	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					
170	Jun-20							-	-	8,768.70	8,768.70
171	Jul-20	2	50,695					50,695.00	50,695.00	8,768.70	59,463.70
172	Aug-20	2		14,014				14,014.00	50,695.00	22,782.70	73,477.70
173	Sep-20							-	50,695.00	22,782.70	73,477.70
174	Oct-20							-	50,695.00	22,782.70	73,477.70
175	Nov-20	2,3		54,100		(8,768.70)		45,331.26	50,695.00	68,113.96	118,808.96
176	Dec-20	2	17,315					17,315.00	68,010.00	68,113.96	136,123.96
177	Jan-21							-	68,010.00	68,113.96	136,123.96
178	Feb-21							-	68,010.00	68,113.96	136,123.96
179	Mar-21							-	68,010.00	68,113.96	136,123.96
180	Apr-21							-	68,010.00	68,113.96	136,123.96
181	May-21							-	68,010.00	68,113.96	136,123.96

182  
 183 **History truncated for ease of viewing**

184  
 185 **NOTES**

- 186 **1** - No interest is applied to this activity.  
 187 **2** - Payments made in:  
 188     July 2020 - see Order 20-217  
 189     August 2020 - see Order 20-266  
 190     November 2020 - see Order 20-423  
 191     December 2020 - see Order 20-450 and 20-448  
 192 **3** - Transferred \$8,768.7 of AWEC June balance to 186288 amortization account.

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Deferral of CUB Intervenor Funding  
 Account Number: 186276  
 Docket UM 1101  
 Last deferral reauthorization was approved in Order No. 20-258

1 Debit (Credit)

2

3

4	Month/Year	Note	Deferral	Transfers	Interest <b>(1)</b>	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)

6

7 Beginning Balance

170	Jun-20					0.00	101,125.00
171	Jul-20					0.00	101,125.00
172	Aug-20					0.00	101,125.00
173	Sep-20					0.00	101,125.00
174	Oct-20					0.00	101,125.00
175	Nov-20	<b>2</b>	-	(101,125.00)		(101,125.00)	0.00
176	Dec-20		-			0.00	0.00
177	Jan-21		101,125.00			101,125.00	101,125.00
178	Feb-21		-			0.00	101,125.00
179	Mar-21					0.00	101,125.00
180	Apr-21					0.00	101,125.00
181	May-21					0.00	101,125.00

182

183 **History truncated for ease of viewing**

184

185 **NOTES**

186 **1** - No interest is applied to this activity.

187 **2** - June balance transferred to account 186286 for amortization.

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Deferral of AWEC Intervenor Funding  
 Account Number: 186278  
 Docket UM 1101  
 Last deferral reauthorization was approved in Order No. 20-258

1	Debit	(Credit)					
2							
3							
4	Month/Year	Note	Deferral	Transfers	Interest <b>(1)</b>	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
170	Jun-20					0.00	14,652.40
171	Jul-20					0.00	14,652.40
172	Aug-20					0.00	14,652.40
173	Sep-20					0.00	14,652.40
174	Oct-20					0.00	14,652.40
175	Nov-20	<b>3</b>	0.00	(14,652)		(14,652.40)	0.00
176	Dec-20		0.00			0.00	0.00
177	Jan-21		0.00			0.00	0.00
178	Feb-21		0.00			0.00	0.00
179	Mar-21		0.00			0.00	0.00
180	Apr-21	<b>2</b>	11,081.33			11,081.33	11,081.33
181	May-21		0.00			0.00	11,081.33

182  
 183 **History truncated for ease of viewing**

184  
 185 **NOTES**

- 186 **1** - No interest is applied to this activity.  
 187 **2** - Payments made in:  
 188     April 2021 - see order 21-101  
 189 **3** - June balance transferred to account 186288 for amortization.

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Amortization of CUB Intervenor Funding  
 Account Number: 186286  
 Dockets UM 1101 and UG 402  
 Amortization of 2019-20 deferral approved in Order 20-342

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							
184	Jun-20		(8,012.83)		99.33	3.74%	(7,913.50)	27,963.01
185	Jul-20		(5,636.01)		78.37	3.74%	(5,557.64)	22,405.37
186	Aug-20		(4,172.96)		63.33	3.74%	(4,109.63)	18,295.74
187	Sep-20		(4,356.39)		50.23	3.74%	(4,306.16)	13,989.58
188	Oct-20		(6,345.41)		33.71	3.74%	(6,311.70)	7,677.88
189	Nov-20 old rates		(9,563.34)		9.03	3.74%	(9,554.31)	(1,876.43)
190	Nov-20 new rates (1)		(4,596.45)	101,125.00	216.60	2.63%	96,745.15	94,868.72
191	Dec-20		(15,576.59)		190.85	2.63%	(15,385.74)	79,482.98
192	Jan-21		(16,033.92)		156.63	2.63%	(15,877.29)	63,605.69
193	Feb-21		(16,267.02)		121.58	2.63%	(16,145.44)	47,460.25
194	Mar-21		(14,131.64)		88.53	2.63%	(14,043.11)	33,417.14
195	Apr-21		(10,199.08)		62.06	2.63%	(10,137.02)	23,280.12
196	May-21		(5,253.96)		45.26	2.63%	(5,208.70)	18,071.42

197  
198 **History truncated for ease of viewing**

199  
200 **NOTES**

201 **1** - Transferred in authorized balances from CUB Deferral account 186276 and Issue Fund Deferral account 186284.

Company: Northwest Natural Gas Company  
 State: Oregon  
 Description: Amortization of AWEC Intervenor Funding  
 Account Number: 186288  
 Dockets UM 1101 and UG 402  
 Amortization of 2019-20 deferral approved in Order 20-342

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							
168	Jun-20		(11,057.64)		180.18	3.74%	(10,877.46)	52,462.23
169	Jul-20		(10,883.80)		146.55	3.74%	(10,737.25)	41,724.98
170	Aug-20		(11,278.51)		112.47	3.74%	(11,166.04)	30,558.94
171	Sep-20		(10,121.99)		79.47	3.74%	(10,042.52)	20,516.42
172	Oct-20		(12,979.77)		43.72	3.74%	(12,936.05)	7,580.37
173	Nov-20 old rates		(839.77)		22.32	3.74%	(817.45)	6,762.92
174	Nov-20 new rates (1)		(2,197.97)	23,421.10	48.92	2.63%	21,272.05	28,034.97
175	Dec-20		(2,497.00)		58.71	2.63%	(2,438.29)	25,596.68
176	Jan-21		(2,511.84)		53.35	2.63%	(2,458.49)	23,138.19
177	Feb-21		(2,380.29)		48.10	2.63%	(2,332.19)	20,806.00
178	Mar-21		(2,555.72)		42.80	2.63%	(2,512.92)	18,293.08
179	Apr-21		(2,274.51)		37.60	2.63%	(2,236.91)	16,056.17
180	May-21		(2,158.30)		32.82	2.63%	(2,125.48)	13,930.69

182 **History truncated for ease of viewing**

184 **NOTES**

185 **1** - Transferred in authorized balances from NWIGU Deferral account 186278 and Issue Fund Deferral account 186284.



UM 1101

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO  
DEFER CERTAIN EXPENSES OR REVENUES**

June 24, 2021

**To All Parties Who Participated in UG 388:**

Please be advised that on June 24, 2021, Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for reauthorization to defer costs associated with Intervenor Funding Grants.

**This is not a rate case.** The purpose of this Notice is to inform parties who participated in the Company's last general rate case, UG 388, that a Reauthorization of Deferral Application has been 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: Kyle Walker, CPA  
250 Taylor Street  
Portland, Oregon 97204  
Telephone: (503) 610-7051**

**Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
PO Box 1088  
Salem, Oregon 97308-1088  
Telephone: (503) 378-6678**

Any person may submit to the Commission written comments on this matter within 25 days of this filing. The granting of this Reauthorization of Deferral Application will not authorize a change in rates, but will permit the Company to defer amounts in rates to a subsequent proceeding.

\*\*\*\*\*





**CERTIFICATE OF SERVICE  
UM 1101**

I hereby certify that on June 24, 2021, I have served by electronic mail the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER CERTAIN EXPENSES OR REVENUES FOR INTERVENOR FUNDING GRANTS upon all parties of record for the Company's last general rate case, UG 388.

**UG 388**

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dockets@oregoncub.org

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