

MARK R. THOMPSON
Manager, Rates and Regulatory Affairs
Tel: 503.721-2476
Fax: 503.721.2516
email: mrt@nwnatural.com



June 5, 2013

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
550 Capitol Street, NE, 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.

A notice concerning this application will be sent to all parties of record in the Company's most recent general rate case, UG 221. A copy of the notice is part of the enclosed application.

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

Sincerely,

/s/ Mark R. Thompson

Mark R. Thompson
Manager, Regulatory Affairs

attachments

**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**

1 In accordance with ORS 757.259 and OAR 860-027-0300, NW Natural (or the
2 “Company”) files this application with the Public Utility Commission of Oregon (the
3 “Commission”) requesting an order re-authorizing the Company to record and defer the cost of
4 intervenor funding grants provided to qualifying organizations pursuant to the provisions of ORS
5 757.259(3), as amended by Oregon Laws 2003, chapter 234 (“Intervenor Funding Grants”) for
6 future amortization in rates. This request is for the period July 1, 2013 through June 30, 2014.

7 In support of this Application, NW Natural states:

8 **1. NW Natural**

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

12 **2. Statutory Authority**

13 This Application is filed pursuant to ORS 757.259, which empowers the Commission to
14 authorize the deferral of expenses or revenues of a public utility for later incorporation in rates.

15 //

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17 //

18 //

1 **3. Communications**

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

4 Jennifer Gross
5 Rates & Regulatory Affairs
6 NW Natural
7 220 NW Second Avenue
8 Portland, OR 97209-3991
9 Telephone: (503) 226-4211, extension 3590
10 Facsimile: (503) 721-2516
11 E-mail: jennifer.gross@nwnatural.com
12

13 and

14
15 Rates & Regulatory Affairs
16 NW Natural
17 220 NW Second Avenue
18 Portland, OR 97209-3991
19 E-mail: eFiling@nwnatural.com
20

21
22 **4. Basis for Application**

23 Statutory Authority

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

34 //

1 Moreover, Section 2 of the Intervenor Funding Act provides:

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

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

8
9 “Upon request of the public utility, the commission by order shall
10 allow deferral of amounts provided as financial assistance under
11 an agreement entered into under section 2 of this 2003 Act for
12 later incorporation in rates.”

13
14 Additionally, the Company notes that deferred amounts under ORS 757.259(3) are not
15 subject to the percentage of gross revenues limitation on amortization or other provisions of
16 subsections (5), (6), (7), and (8) of the amended section.

17 Commission Approval of the Intervenor Funding Agreement

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

28

1 Moreover, Section 2 of the Intervenor Funding Act provides:

2
3 “The commission shall allow a public utility that provides financial
4 assistance under this section to recover the amounts so provided
5 in rates. The commission shall allow a public utility to defer
6 inclusion of those amounts in rates as provided in ORS 757.259 if
7 the public utility so elects.”

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

9
10 “Upon request of the public utility, the commission by order shall
11 allow deferral of amounts provided as financial assistance under
12 an agreement entered into under section 2 of this 2003 Act for
13 later incorporation in rates.”

14 Additionally, the Company notes that deferred amounts under ORS 757.259(3) are not subject
15 to the percentage of gross revenues limitation on amortization or other provisions of subsections
16 (5), (6), (7), and (8) of the amended section.

17 Commission Approval of the Intervenor Funding Agreement

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

27 In its subsequent Order No. 03-405, the Commission directed the utilities to pay to CUB
28 the amounts made available for the CUB Fund Grants as defined and provided for in the
29 Intervenor Funding Agreement. Express Commission approval for payment was necessitated
30 by Section 7.1 of the Intervenor Funding Agreement, which provides that “upon request by CUB,
31 the Commission will direct the Participating Public Utilities to pay the amounts made available
32 for CUB Fund

1 Grants... ”

2 On December 19, 2007, the Commission issued Order No. 07-564, which approved
3 amendments to the Intervenor Funding Agreement previously approved in Order No. 03-388.
4 In a subsequent order, Order No. 12-009, the Commission revised the amounts it directs the
5 utilities to pay to CUB for the CUB Fund Grants as defined and provided for in the Intervenor
6 Funding Agreement. In 2012, Joint Parties amended and restated the Intervenor Funding
7 Agreement and the Commission approved it in Order No. 12-452. This current Intervenor
8 Funding Agreement is effective from January 1, 2013, through December 31, 2017, and it
9 provide intervenors the authority to request more annual funding than allowed in prior years.

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

12 In accordance with the statutory authority provided by ORS 757.259(3), as amended,
13 and the Commission’s approval of the Intervenor Funding Agreement, NW Natural proposes to
14 record and defer the amount of its payment to CUB as directed by Commission Order No. 12-
15 009. The request is pursuant to the terms of the First Amended and Restated Intervenor
16 Funding Agreement (Agreement), approved by the Commission in Order No. 07-564.
17 Additionally, the Company proposes to record and defer, on an ongoing basis, any and all
18 Intervenor Funding Grants as defined and provided for in the Intervenor Funding Agreement, for
19 later incorporation in rates. The Company will record and defer these ongoing costs upon
20 payment of the Intervenor Funding Grants following the Commission’s approval of the
21 Intervenor Funding Grant and issuance of an Order directing the Company to make payment,
22 pursuant to the Intervenor Funding Agreement.

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

24 This request is made in accordance ORS 757.259(3) that allows for the deferral of
25 Intervenor funds, and Commission Order No. 12-009 in Docket No. UM 1357 which directs NW

1 Natural to pay to CUB the amounts made available for the CUB Fund Grants as defined and
2 provided for in the Intervenor Funding Agreement (\$57,500 for NW Natural).

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

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

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

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

	<u>Fund</u>
CUB Fund	\$ 66,125
Preauthorized Matching Fund	\$ 66,125
Issue Fund	<u>\$ 66,125</u>
Total	<u>\$198,375</u>

12
13 For the 12-month period covered by this Application, NW Natural anticipates that the
14 amount subject to this deferral will not exceed \$198,375. However, the Intervenor Funding
15 Agreement permits under certain circumstances for an advance of funds that would otherwise
16 be available in future years, or for the rollover of unused funds from a previous year for
17 Intervenor Funding Grants from the CUB Fund and the Preauthorized Matching Fund. If an
18 advance is made under the applicable provision of the Intervenor Funding Agreement, or grants
19 are made based on available rollover funds, the maximum annual amounts of Intervenor
20 Funding Grants from the CUB Fund or the Preauthorized Grant Fund could exceed the level

1 specified in this paragraph in which case the amount deferred under this Application could
2 exceed \$198,375.

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

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

7 **10. Requirements per Commission Order No. 09-263**

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

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

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

13 Exhibit A will be included in the 2012 PGA filing work papers and in the electronic file
14 entitled "Proposed Temps Oregon 2012-13 PGA filing.xls."

15 **b. The effective date of the deferral**

16 This application is for the 12-month period beginning July 1, 2012 and ending
17 June 30, 2013.

18 **c. Prior year Order Number approving the deferral**

19 Approval to defer costs associated with intervenor funding was last granted
20 under Commission Order No. 12-312.

21 **d. The amount deferred last year.**

	Issue Fund Acct 186284	CUB Fund Acct 186276	Matching Fund Acct 186278
Deferred amounts July 1, 2012 through March 31, 2013	\$97,418	\$66,125	\$51,194

22 //

23 //

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of Intervenor Funding - ISSUE FUND
 Account Number: 186284
 Docket UM 1101
 Last order for deferral reauthorization was Order No. 12-312

1 Debit (Credit)
 2
 3

4	Month/Year	Note	Deferral-CUB	Deferral-NWIGU	Transfers-CUB	Transfers-NWIGU	Interest (1)	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					
70	Nov-11	3			(58,351)	(15,800)		(74,151)	0	0	0
71	Dec-11							0	0	0	0
72	Jan-12							0	0	0	0
73	Feb-12							0	0	0	0
74	Mar-12							0	0	0	0
75	Apr-12	2	3,507					3,507	3,507	0	3,507
76	May-12							0	3,507	0	3,507
77	Jun-12							0	3,507	0	3,507
78	Jul-12							0	3,507	0	3,507
79	Aug-12	2	45,000					45,000	48,507	0	48,507
80	Sep-12							0	48,507	0	48,507
81	Oct-12	2		45,028				45,028	48,507	45,028	93,535
82	Nov-12				(48,507)			(48,507)	0	45,028	45,028
83	Dec-12	2	7,390					7,390	7,390	45,028	52,418
84	Jan-13							0	7,390	45,028	52,418
85	Feb-13							0	7,390	45,028	52,418
86	Mar-13							0	7,390	45,028	52,418

87
 88 **History truncated for ease of viewing**

89
 90 **NOTES**

91 **1** - No interest is applied to this activity

92
 93 **2** - Payments made in:

- 94 April 2012 - see order 12-116
- 95 August 2012 - see order 12-298
- 96 October 2012 - see order 12-388
- 97 December 2012 - see order 12-473

98
 99 **3** - Transfer October CUB balance to 186286 amortization account and transfer October NWIGU 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 order for deferral reauthorization was Order No. 12-312

1 Debit (Credit)

2

3

4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
70	Nov-11	3	0	(57,500)		(57,500)	0
71	Dec-11		0			0	0
72	Jan-12	2	57,500			57,500	57,500
73	Feb-12		0			0	57,500
74	Mar-12		0			0	57,500
75	Apr-12		0			0	57,500
76	May-12		0			0	57,500
77	Jun-12		0			0	57,500
78	Jul-12		0			0	57,500
79	Aug-12		0			0	57,500
80	Sep-12		0			0	57,500
81	Oct-12		0			0	57,500
82	Nov-12	3	0	(57,500)		(57,500)	0
83	Dec-12		0			0	0
84	Jan-13	2	66,125			66,125	66,125
85	Feb-13		0			0	66,125
86	Mar-13		0			0	66,125

87

88 **History truncated for ease of viewing**

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90 **NOTES**

91 **1** - No interest is applied to this activity

92

93 **2** - Payments made in:

94 Jan 2012 - see order 12-009

95 Jan 2013 - see order 13-002

96

97 **3** - October balance transferred to account 186286 for amortization

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of CUB Intervenor Funding
 Account Number: 186286
 Dockets UM 1101 and UG 235
 Amortization of 2011 deferral approved in Order 12-411 of UG 235

1 Debit (Credit)

2
3

4	Month/Year	Note	Amortization	Transfers	Interest	Interest	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	rate	(f)	(g)
6						(e2)		
7	Beginning Balance							
75	Nov-11	old rates	(2,546)		(0)	2.24%	(2,546)	(1,412)
76		new rates (1)	(5,180)	115,851	190	2.01%	110,860	109,449
77	Dec-11		(18,892)		168	2.01%	(18,725)	90,724
78	Jan-12		(20,941)		134	2.01%	(20,807)	69,917
79	Feb-12		(17,003)		103	2.01%	(16,900)	53,017
80	Mar-12		(16,451)		75	2.01%	(16,376)	36,641
81	Apr-12		(12,711)		51	2.01%	(12,660)	23,980
82	May-12		(7,407)		34	2.01%	(7,373)	16,607
83	Jun-12		(5,001)		24	2.01%	(4,978)	11,630
84	Jul-12		(3,283)		17	2.01%	(3,266)	8,363
85	Aug-12		(2,499)		12	2.01%	(2,487)	5,876
86	Sep-12		(2,694)		8	2.01%	(2,686)	3,190
87	Oct-12		(3,866)		2	2.01%	(3,864)	(674)
88	Nov-12	old rates	(4,590)		(5)	2.24%	(4,595)	(5,270)
89		new rates (1)	(3,492)	106,007	128	1.47%	102,642	97,373
90	Dec-12	2	(13,656)	2.07	111	1.47%	(13,543)	83,830
91	Jan-13		(20,436)		90	1.47%	(20,346)	63,484
92	Feb-13		(16,321)		68	1.47%	(16,253)	47,231
93	Mar-13		(12,500)		50	1.47%	(12,450)	34,781

94

95 **History truncated for ease of viewing**

96

97 **NOTES**

98 **1** - Transfer in is from the October balances of CUB Deferral account 186276 and Issue Fund Deferral account 186284

99 **2** - Transfer represents a balance true-up adjustment

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of NWIGU Intervenor Funding
 Account Number: 186278
 Docket UM 1101
 Last order for deferral reauthorization was Order No. 12-312

1 Debit (Credit)

2

3

4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
70	Nov-11	3	0	(3,112)		(3,112)	0
71	Dec-11		0			0	0
72	Jan-12		0			0	0
73	Feb-12		0			0	0
74	Mar-12		0			0	0
75	Apr-12		0			0	0
76	May-12	2	8,593			8,593	8,593
77	Jun-12		0			0	8,593
78	Jul-12		0			0	8,593
79	Aug-12		0			0	8,593
80	Sep-12		0			0	8,593
81	Oct-12		0			0	8,593
82	Nov-12	3	0	(8,593)		(8,593)	0
83	Dec-12	2	51,194			51,194	51,194
84	Jan-13		0			0	51,194
85	Feb-13		0			0	51,194
86	Mar-13		0			0	51,194

87

88 **History truncated for ease of viewing**

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90 **NOTES**

91 **1** - No interest is applied to this activity

92

93 **2** - Payments made in:

94 May 2012 - see order 12-137

95 Dec 2012 - see order 12-482

96

97 **3** - October balance transferred to account 186288 for amortization

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of NWIGU Intervenor Funding
 Account Number: 186288
 Dockets UM 1101 and UG 235
 Amortization of 2011 deferral approved in Order 12-411 of UG 235

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							
60	Nov-11	1	(1,285)	18,912	31	2.01%	17,658	18,046
61	Dec-11		(1,992)		29	2.01%	(1,963)	16,082
62	Jan-12		(1,834)		25	2.01%	(1,809)	14,274
63	Feb-12		(1,843)		22	2.01%	(1,821)	12,453
64	Mar-12		(1,954)		19	2.01%	(1,934)	10,519
65	Apr-12		(1,685)		16	2.01%	(1,669)	8,850
66	May-12		(1,750)		13	2.01%	(1,737)	7,113
67	Jun-12		(1,603)		11	2.01%	(1,592)	5,521
68	Jul-12		(1,558)		8	2.01%	(1,550)	3,972
69	Aug-12		(1,674)		5	2.01%	(1,669)	2,303
70	Sep-12		(1,553)		3	2.01%	(1,550)	753
71	Oct-12		(1,752)		(0)	2.01%	(1,752)	(1,000)
72	Nov-12 old rates		(773)		(2)	2.01%	(775)	(1,775)
73	new rates (1)		(360)	8,593	10	1.47%	8,244	6,469
74	Dec-12		(630)		8	1.47%	(623)	5,847
75	Jan-13		(693)		7	1.47%	(686)	5,160
76	Feb-13		(589)		6	1.47%	(583)	4,577
77	Mar-13		(625)		5	1.47%	(620)	3,958

78
 79 **History truncated for ease of viewing**

80
 81 **NOTES**

82 **1** - Transfer in is from the October balances of NWIGU Deferral account 186278 and Issue Fund Deferral account 186284.
 83
 84
 85



June 5, 2013

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO
DEFER INTERVENOR COSTS**

To All Parties Who Participated in UG 221:

Please be advised that today Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for reauthorization to defer Intervenor Costs, pursuant to the provisions of ORS 757.259(2)(e). 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 of record in the Company's most recent general rate case, UG 221, 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 Avenue
Portland, Oregon 97209-3991
Telephone: (503) 226-4211 ext 3590

Public Utility Commission of Oregon
Attn: Judy Johnson
550 Capitol St., NE, Ste 215
PO Box 2148
Salem, Oregon 97308-2148
Telephone: (503) 378-6636

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.



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing NOTICE OF APPLICATION FOR DEFERRED ACCOUNTING ORDER FOR INTERVENOR COSTS, upon all parties of record in the UG 221 proceeding, which is the Company's most recent general rate case, by electronic mail.

G. CATRIONA MCCRACKEN **W**
CITIZENS' UTILITY BOARD OF OREGON
catriona@oregoncub.org

ROBERT JENKS **W**
CITIZENS' UTILITY BOARD OF OREGON
bob@oregoncub.org

OPUC DOCKETS **W**
CITIZENS' UTILITY BOARD OF OREGON
dockets@oregoncub.org

CHAD M. STOKES **W**
CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD LLP
cstokes@cablehuston.com

TOMMY BROOKS **W**
CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD LLP
tbrooks@cablehuston.com

ED FINKLEA **W**
NORTHWEST INDUSTRIAL GAS USERS
efinklea@nwigu.org

JASON W. JONES **W**
PUC STAFF-DEPARTMENT OF
JUSTICE
jason.w.jones@state.or.us

JESS KINCAID **W**
COMMUNITY ACTION PARTNERSHIP
OF OREGON
jess@caporegon.org

WENDY GERLITZ **W**
NW ENERGY COALITION
wendy@nwenergy.org

JUDY JOHNSON **W**
PUBLIC UTILITY COMMISSION
judy.johnson@state.or.us

TERESA HAGINS **W**
NORTHWEST PIPELINE GP
teresa.l.hagins@williams.com

STEWART MERRICK **W**
NORTHWEST PIPELINE GP
stewart.merrick@williams.com

RANDY DAHLGREN **W**
PORTLAND GENERAL ELECTRIC
pge.opuc.filings@pgn.com

DOUGLAS C TINGEY **W**
PORTLAND GENERAL ELECTRIC
doug.tingey@pgn.com

LISA F RACKNER **W**
MCDOWELL RACKNER & GIBSON PC
dockets@mcd-law.com

DATED at Portland, Oregon, this 5th day of June 2013.

/s/ Jennifer Gross
Jennifer Gross
Rates & Regulatory Affairs
NW NATURAL
220 NW Second Avenue
Portland, Oregon 97209-3991
1.503.226.4211, extension 3590
jgg@nwnatural.com