

Rates and Regulatory Affairs
Facsimile: 503.721.2516



May 19, 2010

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), files electronically the above-referenced Application for an Accounting Order regarding 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 Jennifer Gross at (503) 226-4211 ext. 3590.

Sincerely,

/s/ Inara K. Scott

Inara K. Scott
Manager, Rates and Regulatory Affairs

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, 2010, through June 30, 2011.

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 No. 10-006 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 2010 PGA filing work papers and in the electronic file entitled "Proposed Temps Oregon 2010-11 PGA filing.xls."

b. The effective date of the deferral

This application is for the 12-month period beginning July 1, 2010 and ending June 30, 2011.

c. Prior year Order Number approving the deferral

Approval to defer costs associated with intervenor funding was last granted under Commission Order No. 09-269.

d. The amount deferred last year.

	Issue Fund Acct 186284	CUB Fund Acct 186276	Matching Fund Acct 186278
Deferred amounts July 1, 2009 through March 31, 2010	\$0	\$57,500	\$993

e. The amount amortized last year

	CUB Fund Acct 186286	Matching Fund Acct 186288
Amortized amounts November 1, 2009 through March 31, 2010 with interest	\$43,354	\$4,160

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

In the 2010 PGA filing, the Company estimates that it will seek to amortize the amounts in item 4 above.

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 19th day of May, 2010.

/s/ Inara K. Scott
Inara K. Scott, Manager
Rates & Regulatory Affairs
NW Natural
220 NW Second Avenue
Portland, Oregon 97209
Phone: (503) 721-2476
Facsimile: (503) 721-2516
Email: Inara.scott@nwnatural.com



May 19, 2010

**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 certify that I have on this day served the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER EXPENSES FOR INTERVENOR FUNDING GRANTS upon all parties of record in this proceeding (UG 152), by first-class mail to the following parties or attorneys of parties:

JIM ABRAHAMSON
CASCADE NATURAL GAS CORPORATION
2004 SE CLATSOP STREET
PORTLAND OR 97202

JOHN A CAMERON
DAVIS WRIGHT TREMAINE LLP
1300 SW FIFTH AVENUE STE 2300
PORTLAND OR 97201

JASON EISDORFER
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205

EDWARD A FINKLEA
ENERGY ACTION NORTHWEST
PO BOX 8308
PORTLAND OR 97207

MELANIE L GILLETTE
IGI RESOURCES INC
980 NINTH STREET STE 1540
SACRAMENTO CA 95814

PATRICK G HAGER
PORTLAND GENERAL ELECTRIC
121 SW SALMON STREET 1WTC0702
PORTLAND OR 97204

JUDY JOHNSON
PUBLIC UTILITY COMMISSION OF OREGON
PO BOX 2148
SALEM OR 97308-2148

TED LEHMANN
DIREXX ENERGY
2737 SE 78TH AVENUE STE 101
MERCER ISLAND WA 98040

STEVEN LOUNSBURY
COOS COUNTY OFFICE OF LEGAL COUNSEL
250 NORTH BAXTER
COQUILLE OR 97423

KATHERINE A. MCDOWELL
MCDOWELL RACKNER & GIBSON PC
520 SW SIXTH AVENUE STE 830
PORTLAND OR 97204

DANIEL W MEEK
ATTORNEY AT LAW
10949 SW FOURTH AVE
PORTLAND OR 97219

PAULA E PYRON
NORTHWEST INDUSTRIAL GAS USERS
4113 WOLF BERRY COURT
LAKE OSWEGO OR 97035-1827

DONALD W SCHOENBECK
REGULATORY & COGENERATION SERVICES INC
900 WASHINGTON STREET STE 780
VANCOUVER WA 98660-3455

GORDON J SMITH
JOHN E HENGERER
1730 RHODE ISLAND AVE NW STE 600
WASHINGTON DC 20036-3116

JAY T WALDRON
SCHWABE WILLIAMSON & WYATT
1211 SW FIFTH AVE STE 1600-1900
PORTLAND OR 97204-3795

MICHAEL T WEIRICH
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT STREET NE
SALEM OR 97301-4096

STEVEN WEISS
NORTHWEST ENERGY COALITION
4422 OREGON TRAIL CT NE
SALEM OR 97305

DATED at Portland, Oregon, this 19th day of May, 2010.

/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