

Rates and Regulatory Affairs
Facsimile: 503.721.2532



VIA ELECTRONIC FILING

August 10, 2006

Public Utility Commission of Oregon
550 Capitol Street, Northeast, Suite 215
P. O. Box 2148
Salem, Oregon 97308-2148

ATTN: Vikie Bailey-Goggins, Administrator
Regulatory Operations Division

Re: **OPUC Docket UM 1216:**
Application for Reauthorization to Defer Certain Expenses or Revenues

Northwest Natural Gas Company, dba NW Natural (NW Natural or company), files herewith the above-referenced Application for Reauthorization to Defer Certain Expenses and Revenues. The application is filed in order to continue deferrals relative to the company's purchased gas cost adjustment increment.

An estimate of the amount to be recorded in the deferred accounts for the one-month period specified in the Application is attached hereto as Exhibit A. A notice of this Application has been served on all parties who participated in the company's most recent general rate case, UG 152, and is attached hereto as Exhibit B.

Please call me at 1-503-721-2452 if you have any questions or require any further information.

Sincerely,

/s/ Onita R. King

Onita R. King, Manager
Tariffs & Regulatory Compliance

ORK/cmt
enclosures

1 BEFORE THE PUBLIC UTILITY COMMISSION

2 OF

3 OREGON

4 UM 1216

5 In the Matter of the Application)
6 by NORTHWEST NATURAL GAS COMPANY,)
7 dba NW NATURAL, for Reauthorization)
8 to Defer Certain Expenses or Revenues)
9 Pursuant to ORS 757.259)

10 APPLICATION FOR REAUTHORIZATION
11 TO DEFER CERTAIN EXPENSES OR REVENUES

12 Northwest Natural Gas Company, dba NW Natural (NW Natural or
13 company), hereby files with the Public Utility Commission of Oregon (Commission) this
14 application for reauthorization (Application) to use deferred accounting pursuant to *ORS*
15 *757.210* and *757.259*, and *OAR 860-27-300*, for the one-month period beginning
16 October 1, 2006. The company's last reauthorization was approved by the Commission
17 by its Order No. 05-1055 in its Docket Nos. UG 166/UM 1216, beginning October 1,
18 2005 through September 30, 2006, and, therefore, the existing 12-month
19 reauthorization period has not yet expired. The company is filing this year's, and
20 subsequent years', annual purchased gas adjustment filing with a proposed effective
21 date of November 1, leaving a one-month gap in deferral reauthorization for 2006 only.
22 This application for reauthorization seeks reauthorization for the period beginning
23 October 1, 2006 through October 31, 2006 to cover this circumstance. A separate

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1 reauthorization application will be filed, seeking deferral reauthorization for the period
2 beginning November 1, 2006 through October 31, 2007.

3 The company requests that the Commission approve this one-month
4 deferral reauthorization of NW Natural's automatic adjustment clauses and its currently-
5 effective Purchased Gas Adjustment (PGA), pursuant to *ORS 757.210(1)*. See, Order
6 Nos. 89-1046, 99-272, and 99-697.

7 Specifically, in this Application, NW Natural requests reauthorization to
8 defer:

9 A. One hundred percent (100%) of the difference between the gas cost demand
10 charges collected from rates and the actual gas cost fixed/demand charges experienced
11 by the company as previously authorized in Order Nos. 89-1046, 99-272, and 99-697;

12 B. The commodity charge variation as defined in NW Natural's Tariff P.U.C. Or.
13 24 Schedule P, or its successor, and;

14 C. All previously-authorized account balances related to lost margin and DSM
15 program costs, and PGA commodity and capacity cost deferrals not presently
16 authorized for amortization, or being proposed for amortization, all as described in NWN
17 Advice Nos. OPUC 05-9, 05-9A, and 05-9-B, dated August 15, September 12, and
18 September 19, 2005, respectively.

19 In compliance with the requirements of *OAR 860-027-0300(4)*, NW
20 Natural hereby submits the following information:

21 1. A description of the utility expenses or revenues for which deferred
22 accounting is requested:

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1 a. Demand and other fixed gas costs to be recovered or refunded at
2 one hundred percent (100%) of the difference between the actual cost experienced and
3 the amount collected from rates pursuant to Tariff P.U.C. Or. 24 Schedule P, or its
4 successor, and;

5 b. Commodity gas cost variations to be recovered or refunded as
6 described in NW Natural's Tariff P.U.C. Or. 24 Schedule P, or its successor.

7 2. Justification for the deferred accounting requested with reference to the
8 sections of *ORS 757.259* under which deferral can be authorized:

9 a. Deferral of items 1(a) and 1(b) above can be authorized pursuant to
10 *ORS 757.259(2)(d)* because they are "utility expenses or revenues, the recovery or
11 refund of which the commission finds should be deferred in order to minimize the
12 frequency of rate changes ... or to match appropriately the costs borne by and benefits
13 received by ratepayers."

14 3. The accounts proposed for recording the amounts to be deferred and the
15 accounts that would be used for recording the amounts in the absence of approval of
16 deferred accounting are as follows:

17 a. The charges incurred for gas costs pursuant to the PGA activity
18 and other incurred gas costs, absent the requested account 191 deferral, would be
19 recorded as increases/decreases in the appropriate 401 gas expense subaccount.

20 4. An estimate of the amount to be recorded in the deferred accounts for the
21 one-month period specified in this Application is attached as Exhibit A. Because of
22 market fluctuations, capacity and commodity deferral amounts are impossible to

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1 estimate. Because the Collection vs. Incurred Demand account reflects cyclical
2 collection differences rather than market fluctuations, an estimate for this account is
3 included.

4 5. A description and explanation of the entries in the deferred accounts on
5 the date of this Application for Reauthorization has been provided above in item 4 and is
6 further illustrated in the attached Exhibit A.

7 6. The continuation of deferred accounting for the matters addressed above
8 is justified because they are continuing in nature.

9 7. A notice of this Application has been served on all parties who participated
10 in the company's most recent general rate case, UG 152, and is attached to this
11 Application as Exhibit B.

12 DATED this 10th day of August, 2006.

13 Respectfully submitted,

14 NW NATURAL

15

16 /s/ C. Alex Miller
17 C. Alex Miller, Director
18 Regulatory Affairs & Forecasting
19 220 N.W. Second Avenue
20 Portland, Oregon 97209-3991
21 Phone: (503) 721-2487
22 Email: c2m@nwnatural.com



ESTIMATED ACCUMULATIONS FOR REAUTHORIZATION AS OF OCTOBER 1, 2006
 DEFERRED ACCOUNTS

Certain of the estimated account activity totals are exceptions to the
 reauthorization requirements of ORS 757.259 pursuant to OAR 860-27-300(5)

Line No.	Account Description	Estimated Accumulation	Estimated Interest	TOTAL
1	191.XXX PGA Commodity [1]	-		-
2	191.XXX PGA Capacity [1]	-		-
3	186.599 DSM - unrecovered Program costs	0	0	0
4	191.450 Collection v. Incurred Demand	0	0	0
5	TOTAL	0	0	0

[1] Capacity and commodity amounts impossible to estimate.



August 10, 2005

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

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 reauthorization to defer certain expenses and revenues relative to the company's annual purchased gas cost adjustment, as filed in NWN Advice Nos. OPUC 05-9, 05-9A and 05-9B, approved in the Commission's Order No. 05-1055 in Docket No. UM 1216, and pursuant to the provisions of ORS 757.259(2)(e). Copies of the company's Application are available for inspection at its main and district offices.

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: Onita R. King
220 N.W. Second Ave.
Portland, Oregon 97209-3991
Telephone: (503) 721-2452

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

Any person may submit written comments on this application to the Commission within 25 days of 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.

The company's district offices in Oregon are located at:

7150 Supra Dr., S.W.
Albany, Oregon 97321
Telephone: (541) 926-4253

176 W. Marine Drive
Astoria, Oregon 97103
Telephone: (503) 325-1632

1625 N. 7th Street
Coos Bay, Oregon 97420
Telephone: (541) 267-5655

790 Goodpasture Island Road
Eugene, Oregon 97401
Telephone: (541) 342-3662

1405 S. W. Highway 101
Lincoln City, Oregon 97367
Telephone: (541) 994-2111

309 E. 2nd Street
The Dalles, Oregon 97058
Telephone: (541) 296-2229

3123 Broadway N.E.
Salem, Oregon 97303
Telephone: (503) 585-6611



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER CERTAIN EXPENSES AND REVENUES upon all parties of record in the UG 152 proceeding, which is the last general rate case filed by Northwest Natural Gas Company, dba NW Natural, by electronically mailing a copy thereof, to the parties or attorneys of parties on the following service list:

UG 152 Service List

JASON EISDORFER ENERGY PROGRAM DIRECTOR
CITIZENS' UTILITY BOARD OF OREGON
610 SW BROADWAY STE 308
PORTLAND OR 97205
jason@oregoncub.org

EDWARD A FINKLEA ESQ
CABLE HUSTON ET AL.
1001 SW 5TH - STE 2000
PORTLAND OR 97204
efinklea@chbh.com

JIM ABRAHAMSON COORDINATOR
COMMUNITY ACTION DIRECTORS OF OREGON
PO BOX 7964
SALEM OR 97303-0208
jim@cado-oregon.org

T TED LEHMANN
DIREXX ENERGY
2400 NE 15TH AVE
PORTLAND OR 97212
ted@direxx.com

KATHERINE A MCDOWELL ESQ
MCDOWELL & ASSOCIATES PC
520 SW SIXTH AVE - SUITE 830
PORTLAND OR 97204
katherine@mcd-law.com

DANIEL W MEEK ESQ
10949 SW 4TH AVE
PORTLAND OR 97219
dan@meek.net

JAY T WALDRON
SCHWABE WILLIAMSON & WYATT
1211 SW 5TH AVE STE 1600-1900
PORTLAND OR 97204-3795
jwaldron@schwabe.com

STEVEN WEISS
SR POLICY ASSOCIATE
NORTHWEST ENERGY COALITION
4422 OREGON TRAIL CT NE
SALEM OR 97305
steve@nwenergy.org

DONALD W SCHOENBECK
REGULATORY & COGENERATION SERVICES INC
900 WASHINGTON ST STE 780
VANCOUVER WA 98660-3455
dws@r-c-s-inc.com

JAMES F FELL ESQ
STOEL RIVES LLP
900 SW 5TH AVE STE 2600
PORTLAND OR 97204-1268
jffell@stoel.com

JUDY JOHNSON
PUBLIC UTILITY COMMISSION
PO BOX 2148
SALEM OR 97308-2148
judy.johnson@state.or.us

PAULA E PYRON EXECUTIVE DIRECTOR
NORTHWEST INDUSTRIAL GAS USERS
4113 WOLF BERRY COURT
LAKE OSWEGO OR 97035-1827
ppyron@nwigu.org

MICHAEL T WEIRICH ASSISTANT ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
REGULATED UTILITY & BUSINESS SECTION
1162 COURT ST NE
SALEM OR 97301-4096
michael.weirich@doj.state.or.us

PATRICK G HAGER
MANAGER - REGULATORY AFFAIRS
PORTLAND GENERAL ELECTRIC
121 SW SALMON ST 1WTC0702
PORTLAND OR 97204
patrick.hager@pgn.com

GORDON J SMITH
JOHN & HENGERER
1200 17TH ST NW STE 600
WASHINGTON DC 20036
gsmith@jhenergy.com

MELANIE L GILLETTE
MGR OF REGULATORY AFFAIRS
IGI RESOURCES INC
980 NINTH ST STE 1540
SACRAMENTO CA 95814
mlgillette@duke-energy.com

STEVEN LOUNSBURY
COOS COUNTY OFFICE OF LEGAL COUNSEL
250 N BAXTER
COQUILLE OR 97423
cooscc@co.coos.or.us

JOHN A CAMERON
DAVIS WRIGHT TREMAINE LLP
1300 SW FIFTH AVENUE STE 2300
PORTLAND OR 97201
johncameron@dwt.com

DATED this 10th day of August, 2006.

Respectfully submitted,

NW NATURAL

/s/ Kelley Miller
Kelley Miller, Staff Assistant
Rates & Regulatory Affairs
220 N.W. Second Avenue
Portland, OR 97209-3991
(503) 226-4211, ext. 3589
kelly.miller@nwnatural.com