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VIA ELECTRONIC FILING

September 24, 2019

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Post Office Box 1088
Salem, Oregon 97301-1088

Re: OPUC Docket UM 1496; Application for Reauthorization to Defer Certain Expenses or Revenues

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

A Notice concerning this Application will be sent to all parties who participated in the Company's most recent general rate case, UG 344, and is attached hereto as Exhibit B.

A Certificate of Service is attached as Exhibit C.

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

eFiling
Rates & Regulatory Affairs
NW Natural
220 NW Second Avenue
Portland, Oregon 97209
Telephone: (503) 226-4211, ext. 3589
Fax: (503) 220-2579
eFiling@nwnatural.com

Sincerely,

/s/ Kyle Walker, CPA

Kyle Walker, CPA
Rates/Regulatory Manager

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1496

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba, NW NATURAL

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

APPLICATION

1 Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the
2 “Company”) hereby files with the Public Utility Commission of Oregon (the
3 “Commission”) this application (“Application”) seeking reauthorization to use deferred
4 accounting pursuant to ORS 757.210 and 757.259, and OAR 860-27-300, for the 12-
5 month period beginning November 1, 2019 through October 31, 2020 for all expenses
6 associated with gas commodity costs and demand costs.

7 NW Natural seeks to defer these expenses or revenues so that they can be
8 recovered or returned to customers through the Company’s annual Purchased Gas
9 Adjustment (PGA), pursuant to ORS 757.210(1)(b).

10 In support of this Application, NW Natural states:

11 **A. NW Natural.**

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

1 **B. Statutory Authority.**

2 This application is filed pursuant to ORS 757.259, which empowers the
3 Commission to authorize the deferral of expenses or revenues of a public utility for later
4 inclusion in rates.

5 **C. Communications.**

6 Communications regarding this Application should be addressed to:

7 NW Natural
8 eFiling for Regulatory Affairs
9 220 NW Second Avenue
10 Portland, Oregon 97209-3991
11 Telephone: (503) 226-4211, ext. 3589
12 Facsimile: (503) 220-2579
13 Email: eFiling@nwnatural.com;

14
15 Eric W. Nelsen (OSB# 192566)
16 Senior Regulatory Attorney
17 220 NW Second Avenue
18 Portland, Oregon 97209-3991
19 Phone: (503) 721-2476
20 Email: eric.nelsen@nwnatural.com;

21
22 and

23
24 Kyle Walker, CPA
25 Rates & Regulatory Affairs
26 220 NW Second Avenue
27 Portland, Oregon 97209-3991
28 Phone: (503) 226-4211 Ext. 5858
29 Email: Kyle.Walker@nwnatural.com

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

32 NW Natural hereby requests the authorization to use deferred accounting for the
33 following:

- 1 1) Demand and other fixed gas costs to be recovered or refunded at one
2 hundred percent (100%) of the difference between the actual cost
3 experienced and the amount collected from rates pursuant to Tariff P.U.C.
4 Or. 25 Schedule P, or its successor, and as previously authorized in
5 Commission Order Nos. 89-1046, 99-272, and 99-697;
- 6 2) Commodity gas cost variations to be recovered or refunded as described
7 in NW Natural's Tariff P.U.C. Or. 25 Schedule P, or its successor;
- 8 3) All previously-authorized account balances related to PGA commodity and
9 capacity cost deferrals not presently authorized for amortization or being
10 proposed for amortization, all as described in NW Natural Advice No. 19-
11 15.

12 **E. Reasons for Application for Reauthorization of Deferred Accounting – OAR**
13 **860-027-0300(3)(b).**

14 The authorization for deferred accounting treatment as described above can be
15 authorized pursuant to ORS 757.259(2)(e) because the described balances are “utility
16 expenses or revenues, the recovery or refund of which the commission finds should be
17 deferred in order to minimize the frequency of rate changes ... or to match appropriately
18 the costs borne by and benefits received by ratepayers.” Additionally, NW Natural's
19 Tariff P.U.C. Or. 25 Schedule P provides for the collection of these costs through
20 deferred accounting treatment and subsequent amortization through the Company's
21 Purchased Gas Adjustment, which is implemented pursuant to ORS 757.210(1)(b).

22 ///

23 ///

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

2 Beginning on November 1, 2019 and ending twelve months from this date, NW
3 Natural proposes to account for charges incurred for gas costs pursuant to the PGA
4 activity and other incurred gas costs, absent the requested account 191 deferral, be
5 recorded as increases/decreases in the appropriate 80X gas expense subaccounts.

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

7 NW Natural is unable to estimate the amount to be deferred during the next PGA
8 cycle. Please note that market fluctuations and cyclical collection differences make it
9 impossible to accurately estimate capacity and commodity deferral amounts.

10 **H. Entries into deferred account during past 12 months - OAR 860-027-0300(4)(a)**

11 Pursuant to OAR 860-027-300(4)(a), NW Natural has deferred \$19,997,384.93
12 for the months July 2018 through June 2019.

13 **I. Reason for Continuation of Deferred Accounting – OAR 860-027-0300(4)(b)**

14 The continuation of deferred accounting for the matters addressed above is
15 justified because they are continuing in nature.

16 **J. Requirement per Commission Order No. 09-263**

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

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

22 Exhibit A includes the Summary Sheet which shows the amounts deferred
23 and demonstrates the transfer of dollars from one account to another. Exhibit

1 A was attached to our electronic 2019-20 PGA filing as a file entitled,
2 "Proposed_Temps_Oregon_2019-2020_PGA_update_thru_6.30.19.xlsx."

3 **2. The effective date of the deferral**

4 This application is for the 12-month period beginning November 1, 2019 and
5 ending October 31, 2020.

6 **3. Prior year Order Number approving the deferral**

7 Approval to defer costs associated with PGA-related expenses was last
8 granted under Commission Order No. 19-154 issued on April 26, 2019.

9 **4. The amount deferred last year.**

10 See Exhibit A.

11 **5. The amount amortized last year.**

12 See Exhibit A.

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

14 The interest rate for deferral accounts is 7.317%. Monies that have been
15 transferred for amortization accrue interest at the rate of 3.74%.

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

17 NW Natural is unable to estimate the amount to be deferred during the next
18 PGA cycle. The Company's intent is to amortize for collection all that is
19 deferred.

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1 **K. Notice – OAR 800-027-0300(3)(e)(6).**

2 A notice of this Application has been served on the all parties who participated in
3 the Company's most recent general rate case, UG 344, and is attached to this
4 Application as Exhibit B.

5 NW Natural respectfully requests that the Commission issue an order
6 reauthorizing the Company to defer the expenses or revenues described in the
7 Application to ensure that the Company will be authorized to recover costs associated
8 with the Company's annual Purchased Gas Adjustment (PGA).

9 Dated this 24th day of September, 2019.

10 Respectfully Submitted,

11 NW NATURAL

12 /s/ Kyle Walker, CPA
13 Kyle Walker, CPA
14 Rates/Regulatory Manager

15
16 /s/ Eric W. Nelsen
17 Eric W. Nelsen (OSB# 192566)
18 Senior Regulatory Attorney
19 220 NW Second Avenue
20 Portland, Oregon 97209-3991
21 Phone: (503) 721-2476
22 Email: eric.nelsen@nwnatural.com

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of Oregon WACOG Deferral
 Account Number: 191401
 Dockets UM 1496 and UG 355
 Amortization of 2017-18 deferral approved in Order No. 18-386

1	2	3	4	5	6	7	8	9	10	11	12
Debit	(Credit)	Month/Year	Note	Amortization	Transfers	Interest	Interest rate	Activity	Balance		
		(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)		
162		Beginning Balance									
163		Nov-18 old rates		211,214.66		830.25	2.38%	212,044.91	525,053.10		
164		Nov-18 new rates (1)		559,105.90	(14,895,472.99)	(35,565.41)	2.92%	(14,371,932.50)	(13,846,879.40)		
165		Dec-18		1,963,436.97		(31,305.22)	2.92%	1,932,131.75	(11,914,747.65)		
166		Jan-19		2,274,653.66		(26,225.06)	2.92%	2,248,428.60	(9,666,319.06)		
167		Feb-19		2,247,352.16		(20,787.10)	2.92%	2,226,565.06	(7,439,754.00)		
168		Mar-19		2,334,833.30		(15,262.69)	2.92%	2,319,570.61	(5,120,183.39)		
169		Apr-19		1,338,641.57		(10,830.43)	2.92%	1,327,811.14	(3,792,372.25)		
170		May-19		865,506.25		(8,175.07)	2.92%	857,331.18	(2,935,041.08)		
171		Jun-19		610,223.64		(6,399.49)	2.92%	603,824.15	(2,331,216.93)		
172		Jul-19 forecast		442,715.24		(5,133.99)	2.92%	437,581.25	(1,893,635.68)		
173		Aug-19 forecast		440,215.85		(4,072.25)	2.92%	436,143.60	(1,457,492.08)		
174		Sep-19 forecast		475,496.56		(2,968.04)	2.92%	472,528.52	(984,963.56)		
175		Oct-19 forecast		975,688.17		(1,209.66)	2.92%	974,478.51	(10,485.05)		
176											
177											
178											
179											

History truncated for ease of viewing **Amount amortized during Nov 18- Jun 19 with interest: 12,251,247.87**

NOTES:

1 - Transferred in authorized balance from accounts 191400 and 191405.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of Oregon Demand Deferral
 Account Number: 191411
 Dockets UM 1496 and UG 355
 Amortization of 2017-18 deferral approved in Order No. 18-386

Debit (Credit)	Month/Year	Note (b)	Amortization (c)	Transfers (d)	Interest (e1)	Interest Rate (e2)	Activity (f)	Balance (g)
Beginning Balance								
	Nov-18	old rates	418,199.00		228.10	2.38%	418,427.10	324,336.49
	Nov-18	new rates (1)	132,771.42	(3,888,882.37)	(9,301.41)	2.92%	(3,765,412.36)	(3,441,075.87)
	Dec-18		519,381.07		(7,741.37)	2.92%	511,639.70	(2,929,436.17)
	Jan-19		603,499.20		(6,394.04)	2.92%	597,105.16	(2,332,331.01)
	Feb-19		597,327.14		(4,948.59)	2.92%	592,378.55	(1,739,952.46)
	Mar-19		623,656.70		(3,475.10)	2.92%	620,181.60	(1,119,770.86)
	Apr-19		346,432.48		(2,303.28)	2.92%	344,129.20	(775,641.66)
	May-19		219,236.70		(1,620.66)	2.92%	217,616.04	(558,025.62)
	Jun-19		152,190.08		(1,172.70)	2.92%	151,017.38	(407,008.23)
	Jul-19	forecast	107,002.76		(860.20)	2.92%	106,142.56	(300,865.67)
	Aug-19	forecast	106,434.91		(602.61)	2.92%	105,832.30	(195,033.37)
	Sep-19	forecast	114,922.33		(334.76)	2.92%	114,587.57	(80,445.80)
	Oct-19	forecast	248,505.79		106.60	2.92%	248,612.39	168,166.59

History truncated for ease of viewing

Amount amortized during Nov 18- Jun 19 with interest: 3,575,964.75

NOTES:

1 - Transferred in authorized balances from accounts 191410, 191450, and 191417.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Core Market Commodity gas cost deferral
 Account Number: 191400
 Docket UM 1496
 Last deferral reauthorization was approved in Order 19-154

Narrative: Deferral of customer's share of the difference between actual core commodity cost incurred and the Annual Sales WACOG embedded in customer rates. For the Nov 2018 - Oct 2019 PGA year, the deferral election was 90%.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Debit	(Credit)	Month/Year	Note	Commodity Deferral	Storage Adjustment	Hedge Adjustment	Interest	Interest Rate	Transfer	Activity	Balance					
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)					
Beginning Bal																
Nov-18	1	6,954,172.53	(6,742.39)	3,747.30	16,474.31	7.317%	14,895,472.99	21,863,125		6,193,876.11						
Dec-18		3,593,300.08	(9,319.01)	2,295.50	48,700.82	7.317%		3,634,977		9,828,853.50						
Jan-19		1,405,971.76	(9,527.60)	3,262.50	64,198.79	7.317%		1,463,905		11,292,758.95						
Feb-19		7,588,319.31	(10,442.97)	6,704.40	91,981.09	7.317%		7,676,562		18,969,320.78						
Mar-19	2	3,494,190.29	(7,833.00)	1,936.50	126,300.35	7.317%	(2.89)	3,614,591		22,583,912.03						
Apr-19		(2,217,421.36)	(4,638.03)	(4,283.80)	130,917.84	7.317%		(2,095,425)		20,488,486.68						
May-19		(1,116,880.03)	(2,885.15)	673.20	121,516.72	7.317%		(997,575)		19,490,911.41						
Jun-19	2	(382,934.93)	(2,042.21)	0.00	117,672.13	7.317%	0.21	(267,305)		19,223,606.62						
Jul-19					117,215.94	7.317%		117,216		19,340,822.56						
Aug-19					117,930.67	7.317%		117,931		19,458,753.23						
Sep-19					118,649.75	7.317%		118,650		19,577,402.98						
Oct-19					119,373.21	7.317%		119,373		19,696,776.19						

History truncated for ease of viewing

Amount deferred during Nov 18 - Jun 19 with interest: 19,997,384.93

NOTES:

1 - Transferred June balance plus July-October interest on June balance to account 191401 for amortization.

2 - Transfer represents true-up of balance to the general ledger.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Core Market Demand cost deferral
 Account Number: 191410
 Docket UM 1496
 Last deferral reauthorization was approved in Order 19-154

Narrative: Deferral of 100% of the difference between actual demand cost incurred and the demand cost embedded in customer rates.

1	2	3	4	5	6	7	8	9	10	11	12	13
Debit	(Credit)	Month/Year	Note	Demand Deferral	Transfer	Interest	Interest Rate	Activity	Balance			
(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)					
Beginning Bal												
150	Nov-18	1	(195,067.40)	390,216.11	(1,541.98)	7.317%	193,606.74	(351,963.11)				
151	Dec-18		(102,076.33)		(2,457.30)	7.317%	(104,533.63)	(456,496.74)				
152	Jan-19		(117,355.63)		(3,141.28)	7.317%	(120,496.91)	(576,993.66)				
153	Feb-19		59,178.73		(3,337.80)	7.317%	55,840.93	(521,152.72)				
154	Mar-19		10,718.37		(3,145.05)	7.317%	7,573.32	(513,579.40)				
155	Apr-19		38,098.26		(3,015.40)	7.317%	35,082.86	(478,496.54)				
156	May-19		(16,225.78)		(2,967.10)	7.317%	(19,192.88)	(497,689.42)				
157	Jun-19		(32,886.40)		(3,134.92)	7.317%	(36,021.32)	(533,710.74)				
158	Jul-19				(3,254.30)	7.317%	(3,254.30)	(536,965.04)				
159	Aug-19				(3,274.14)	7.317%	(3,274.14)	(540,239.18)				
160	Sep-19				(3,294.11)	7.317%	(3,294.11)	(543,533.29)				
161	Oct-19				(3,314.19)	7.317%	(3,314.19)	(546,847.48)				
162												
163												
164												
165												
166												

History truncated for ease of viewing

Amount deferred during Nov 18 - Jun 19 with interest: (378,357)

NOTES

1 - Transferred June balance plus July-October interest on June balance to account 191411 for amortization.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Seasonalized Demand Collection Deferral
 Account Number: 191450
 Docket UM 1496
 Last deferral reauthorization was approved in Order 19-154

Narrative: Deferral of 100% of the difference between actual demand costs collected and the seasonalized imbedded demand costs embedded in customer rates.

Debit (Credit)	Month/Year	Note	Demand Deferral	Interest	Interest Rate	Transfer	Activity	Balance
	(a)	(b)	(d)	(e)	(f)	(g)	(i)	(j)
Beginning Bal								
150	Nov-18	1	541,464.42	2,988.35	7.317%	3,673,341.96	4,217,794.73	763,815.62
151	Dec-18		683,521.03	6,741.25	7.317%		690,262.28	1,454,077.90
152	Jan-19		474,927.66	10,314.18	7.317%		485,241.84	1,939,319.74
153	Feb-19		(2,732,818.97)	3,493.32	7.317%		(2,729,325.65)	(790,005.91)
154	Mar-19		(925,081.12)	(7,637.40)	7.317%		(932,718.52)	(1,722,724.43)
155	Apr-19		756,240.02	(8,198.73)	7.317%		748,041.29	(974,683.14)
156	May-19		627,571.59	(4,029.82)	7.317%		623,541.77	(351,141.37)
157	Jun-19	2	333,580.42	(1,124.07)	7.317%	1.99	332,458.34	(18,683.03)
158	Jul-19			(113.92)	7.317%		(113.92)	(18,796.95)
159	Aug-19			(114.61)	7.317%		(114.61)	(18,911.56)
160	Sep-19			(115.31)	7.317%		(115.31)	(19,026.87)
161	Oct-19			(116.02)	7.317%		(116.02)	(19,142.89)
162								
163								
164								
165								
166								
167								
168								

History truncated for ease of viewing

Amount deferred during Nov 18 - Jun 19 with interest: (238,048)

NOTES

1 -Transferred June balance plus July-October interest on June balance to account 191411 for amortization.

2 -Transfer represents true-up to general ledger.



UM 1496

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

September 24, 2019

To All Parties Who Participated in UG 344:

Please be advised that on September 24, 2019 Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), applied for reauthorization to continue deferrals relative to the Company's annual purchased gas cost adjustment and pursuant to the provisions of ORS 757.259(2)(e).

This is not a rate case. The purpose of this Notice is to inform parties who participated in the Company's most recent general rate case, UG 344, 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
220 NW Second Ave
Portland, Oregon 97209-3991
Telephone: (503) 226-4211 Ext 5858**

**Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, Oregon 97301-1088
Telephone: (503) 373-0886**

Any person may submit to the Commission written comments on this matter by October 24, 2019. 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
Docket UM 1496**

I hereby certify that on September 24, 2019 I served by electronic mail the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER CERTAIN EXPENSES OR REVENUES FOR THE COMPANY'S PURCHASED GAS ADJUSTMENT MECHANISM by electronic mail to all parties of record for the Company's most recent general rate case, UG 344.

UG 344

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DATED September 24, 2019 Portland, OR.

/s/ Erica Lee-Pella
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