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August 31, 2011

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 ____; NW Natural Advice No. OPUC 11-11;
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 to continue deferrals relative to the Company's purchased gas cost adjustment increment.

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.

A Certificate of Service is attached as Exhibit C.

If you have any questions, please call me at (503) 226-4211, ext. 3590.

Sincerely,

/s/ Jennifer Gross

Jennifer Gross
Tariff and Regulatory Compliance

attachments

1 BEFORE THE PUBLIC UTILITY COMMISSION

2 OF

3
4 OREGON

5
6 UM _____

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

14
15
16 APPLICATION FOR REAUTHORIZATION
17 TO DEFER CERTAIN EXPENSES OR REVENUES

18
19
20 Northwest Natural Gas Company, dba NW Natural (NW Natural or Company),
21 hereby files with the Public Utility Commission of Oregon (Commission) this application
22 for reauthorization (Application) to use deferred accounting pursuant to ORS 757.210
23 and 757.259, and OAR 860-27-300, for the 12-month period beginning November 1,
24 2011 through October 31, 2012.

25 NW Natural requests that, as part of its reauthorization, the Commission approve
26 NW Natural's automatic adjustment clauses and the Purchased Gas Adjustment (PGA),
27 pursuant to ORS 757.210(1).¹

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¹ See Order Nos. 89-1046, 99-272, and 99-697.

1 In support of this Application, NW Natural states:

2 **A. NW Natural**

3 NW Natural is a public utility in the state of Oregon and is subject to the
4 jurisdiction of the Commission regarding rates, service and accounting practices. NW
5 Natural also provides retail natural gas service in the states of Oregon and Washington.

6 **B. Statutory Authority**

7 This application is filed pursuant to ORA 757.259 and ORS 727.262, which
8 empowers the Commission to authorize the deferral of expenses or revenues of a public
9 utility for later inclusion in rates.

10 **C. Communications**

11 Communications regarding this Application should be addressed to:

12 NW Natural
13 e-filing for Regulatory Affairs
14 220 NW Second Avenue
15 Portland, Oregon 97209-3991
16 Telephone: (503) 226-4211, ext. 3589
17 Facsimile: (503) 721-2516
18 E-mail: eFiling@nwnatural.com

19
20 and

21
22 Jennifer Gross
23 Tariff and Regulatory Affairs Consultant
24 NW Natural
25 220 NW Second Avenue
26 Portland, Oregon 97209-3991
27 Telephone: (503) 226-4211, ext. 3590
28 Facsimile: (503) 721-2516
29 E-mail: jennifer.gross@nwnatural.com

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1 **D. Description of Request - OAR 860-0270300(3)(a)**

2 NW Natural hereby requests the authorization to use deferred accounting for the
3 following:

- 4 1) Demand and other fixed gas costs to be recovered or refunded at one
5 hundred percent (100%) of the difference between the actual cost
6 experienced and the amount collected from rates pursuant to Tariff P.U.C.
7 Or. 24 Schedule P, or its successor, and as previously authorized in
8 Commission Order Nos. 89-1046, 99-272, and 99-697;
- 9 2) Commodity gas cost variations to be recovered or refunded as described
10 in NW Natural's Tariff P.U.C. Or. 24 Schedule P, or its successor; and
- 11 3) All previously-authorized account balances related to PGA commodity and
12 capacity costs deferrals not presently authorized for amortization or being
13 proposed for amortization, all as described in NW Natural Advice No. 11-
14 9.

15 **E. Reason for Application for Reauthorization of Deferred Accounting - OAR**
16 **860-027-0300(3)(c)**

17 The authorization to defer accounting as described above can be authorized
18 pursuant to ORS 757.259(2)(d) because the described balances are "utility expenses or
19 revenues, the recovery or refund of which the commission finds should be deferred in
20 order to minimize the frequency of rate changes ... or to match appropriately the costs
21 borne by and benefits received by ratepayers."

22 //

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

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

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

6 The table below provides an estimated amount to be recorded in the deferred
7 accounts for the 12-month period subsequent to the Application. Please note that
8 market fluctuations make it impossible to accurately estimate capacity and commodity
9 deferral amounts. Also, the Collection v. Incurred Demand account reflects cyclical
10 collection differences that are difficult to predict.

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

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

14 **I. Requirements per Commission Order No. 09-263**

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

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

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

22 A will be included in our 2012 PGA filing as work papers and will be attached

1 to the electronic filing as a file entitled, "Proposed Temps Oregon 2011-12
2 PGA August filing.xls."

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

4 This application is for the 12-month period beginning November 1, 2011 and
5 ending October 31, 2012.

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

7 Permission to defer PGA-related expenses or revenues was last granted in
8 Commission Order No. 10-442, issued November 3, 2011.

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 8.618%. Monies that have been
15 transferred for amortization accrue interest at the rate of 2.24%.

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 **J. Notification of Filing**

2 A notice of this Application has been served on all parties who participated in the
3 Company's most recent general rate case, UG 152, and is attached to this Application
4 as Exhibit B.

5 DATED this 31st day of August 2011.

6 Respectfully submitted,

7 NW NATURAL

8 */s/ Jennifer Gross*

9 _____
10 Jennifer Gross
11 Rates & Regulatory Affairs
12 220 NW Second Avenue
13 Portland, Oregon 97209-3991
14 Phone: (503) 226-4211, ext. 3590
15 Email: jennifer.gross@nwnatural.com

EXHIBIT A

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of Oregon WACOG Deferral
 Account Number: 191401

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							
51	Jan-10		4,686,910.99		(44,681.30)	2.05%	4,642,229.69	(23,856,130.53)
52	Feb-10		3,496,884.62		(37,767.30)	2.05%	3,459,117.32	(20,397,013.21)
53	Mar-10		3,098,842.84		(32,197.97)	2.05%	3,066,644.87	(17,330,368.34)
54	Apr-10		3,024,257.29		(27,022.83)	2.05%	2,997,234.46	(14,333,133.88)
55	May-10		2,349,961.32		(22,478.51)	2.05%	2,327,482.81	(12,005,651.07)
56	Jun-10		1,832,968.70		(18,943.99)	2.05%	1,814,024.71	(10,191,626.36)
57	Jul-10		1,221,957.01		(16,366.94)	2.05%	1,205,590.07	(8,986,036.29)
58	Aug-10		1,054,267.69		(14,450.63)	2.05%	1,039,817.06	(7,946,219.23)
59	Sep-10		1,132,711.61		(12,607.27)	2.05%	1,120,104.34	(6,826,114.89)
60	Oct-10		1,406,423.05		(10,459.96)	2.05%	1,395,963.09	(5,430,151.80)
61	Nov-10	old rates	1,054,050.11		(8,376.17)	2.05%	1,045,673.94	(4,384,477.86)
62		new rates 1	986,672.11	(17,304,991.56)	(31,381.76)	2.24%	(16,349,701.21)	(20,734,179.07)
63	Dec-10		2,796,096.42		(36,094.11)	2.24%	2,760,002.31	(17,974,176.76)
64	Jan-11		3,224,984.34		(30,541.81)	2.24%	3,194,442.53	(14,779,734.23)
65	Feb-11		2,593,138.64		(25,168.57)	2.24%	2,567,970.07	(12,211,764.16)
66	Mar-11		2,732,565.42		(20,244.90)	2.24%	2,712,320.52	(9,499,443.64)
67	Apr-11		2,069,042.83		(15,801.19)	2.24%	2,053,241.64	(7,446,202.00)
68	May-11		1,632,021.74		(12,376.36)	2.24%	1,619,645.38	(5,826,556.62)
69	Jun-11		1,098,966.59		(9,850.54)	2.24%	1,089,116.05	(4,737,440.57)
70	Jul-11		725,713.24		(8,165.89)	2.24%	717,547.35	(4,019,893.22)
71	Aug-11	forecast	585,974.90		(6,956.89)	2.24%	579,018.01	(3,440,875.21)
72	Sep-11	forecast	648,076.09		(5,818.10)	2.24%	642,257.99	(2,798,617.22)
73	Oct-11	forecast	1,328,213.29		(3,984.42)	2.24%	1,324,228.87	(1,474,388.35)

76 History truncated for ease of viewing

Amount Amortized Nov 10 - Oct 11 with interest:	20,215,081.07
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78 NOTES:

79 1 - Transfer in from deferral account 191400, and in 2010, residual from account 186306

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81

EXHIBIT A

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of Oregon Demand Deferral
 Account Number: 191411

1	Debit	(Credit)						
2								
3						Interest		
4	Month/Year	Note	Amortization	Transfers	Interest	Rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)		(f)	(g)
6								
7	Beginning Balance							
51	Jan-10		633,413.70		(4,789.74)	2.24%	628,623.96	(2,254,016.58)
52	Feb-10		460,439.86		(3,777.75)	2.24%	456,662.11	(1,797,354.47)
53	Mar-10		402,882.40		(2,979.04)	2.24%	399,903.36	(1,397,451.11)
54	Apr-10		382,446.87		(2,251.62)	2.24%	380,195.25	(1,017,255.86)
55	May-10		288,265.92		(1,629.83)	2.24%	286,636.09	(730,619.77)
56	Jun-10		219,500.42		(1,158.96)	2.24%	218,341.46	(512,278.31)
57	Jul-10		146,991.66		(819.06)	2.24%	146,172.60	(366,105.71)
58	Aug-10		122,006.17		(569.52)	2.24%	121,436.65	(244,669.06)
59	Sep-10		132,458.71		(333.09)	2.24%	132,125.62	(112,543.44)
60	Oct-10		166,806.30		(54.40)	2.24%	166,751.90	54,208.46
61	Nov-10	old rates	246,696.89		331.44	2.24%	247,028.33	301,236.79
62		new rates 1	(168,958.75)	5,556,204.32	10,213.89	2.24%	5,397,459.46	5,698,696.25
63	Dec-10		(445,074.28)		10,222.16	2.24%	(434,852.12)	5,263,844.13
64	Jan-11		(748,032.22)		9,127.68	2.24%	(738,904.54)	4,524,939.59
65	Feb-11		(597,858.37)		7,888.55	2.24%	(589,969.82)	3,934,969.77
66	Mar-11		(631,307.86)		6,756.06	2.24%	(624,551.80)	3,310,417.97
67	Apr-11		(472,114.39)		5,738.81	2.24%	(466,375.58)	2,844,042.39
68	May-11		(369,127.82)		4,964.36	2.24%	(364,163.46)	2,479,878.93
69	Jun-11		(241,770.38)		4,403.45	2.24%	(237,366.93)	2,242,512.00
70	Jul-11		(152,748.06)		4,043.46	2.24%	(148,704.60)	2,093,807.40
71	Aug-11	forecast	(120,558.18)		3,795.92	2.24%	(116,762.26)	1,977,045.14
72	Sep-11	forecast	(135,289.13)		3,564.21	2.24%	(131,724.92)	1,845,320.22
73	Oct-11	forecast	(299,739.07)		3,164.84	2.24%	(296,574.23)	1,548,745.99
74								
75	History truncated for ease of viewing			Amount Amortized Nov 10 - Oct 11 with interest:				(4,308,695.12)
76								

NOTES:

1 - Transfer from deferral accounts 191410, 191450, 191417

EXHIBIT A

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Core Market Commodity gas cost deferral
 Account Number: 191.400
 Current docket is UM 1496
 Current Reauthorization was granted in Order No. 10-442

Narrative: Deferral of customer's share of the difference between actual core commodity cost incurred and the Annual Sales WACOC embedded as defined in the related annual PGA. Prior to Nov 08 deferral was 67%; Nov 08 - Oct 08 deferral was 80%
 From Nov 09 forward deferral is 90%

1	Debit (Credit)										Deferral
2			Commodity	8.618%		Storage	Hedge				Plus Int.
3	Month/Year		Deferral /3	Interest	Adjustment	Adjustment 2/	Adjustment	Transfer	Activity		GL Balance
4	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
5											
46	Jan-10			186,499	(39,044)		(10,452)	0		137,003	(5,387,580)
47	Feb-10			(614,891)	(40,930)		(8,505)	0		(664,326)	(6,051,906)
48	Mar-10			(1,765,863)	(49,835)		(8,806)	0		(1,824,504)	(7,876,410)
49	Apr-10			(2,112,002)	(64,176)		(7,263)	0		(2,183,441)	(10,059,851)
50	May-10			(2,434,277)	(81,007)		(5,277)	0		(2,520,561)	(12,580,411)
51	Jun-10			(1,242,188)	(94,822)		(3,784)	0		(1,340,794)	(13,921,206)
52	Jul-10			(199,101)	(100,702)		(2,743)	0		(302,546)	(14,223,752)
53	Aug-10			(303,342)	(103,250)		(2,852)	0		(409,444)	(14,633,196)
54	Sep-10			(1,215,664)	(109,467)		(3,041)	0		(1,328,172)	(15,961,368)
55	Oct-10			(1,243,806)	(119,114)		(5,244)	0		(1,368,164)	(17,329,532)
56	Nov-10	1/		(1,618,763)	(5,887)		(20,704)	0	17,329,532	15,684,178	(1,645,354)
57	Dec-10			(1,359,405)	(16,788)		(25,054)	0		(1,401,247)	(3,046,601)
58	Jan-11			(991,559)	(25,534)		(26,156)	0		(1,043,249)	(4,089,850)
59	Feb-11			(3,363,913)	(41,541)		(24,964)	0		(3,430,418)	(7,520,268)
60	Mar-11			(1,935,496)	(61,036)		(21,582)	0		(2,018,114)	(9,538,381)
61	Apr-11			(3,402,461)	(80,781)		(17,236)	0		(3,500,478)	(13,038,859)
62	May-11			(757,390)	(96,402)		(11,637)	0		(865,429)	(13,904,289)
63	Jun-11			(448,870)	(101,494)		(7,194)	0		(557,558)	(14,461,846)
64	Jul-11			(93,265)	(104,216)		(5,838)	0		(203,319)	(14,665,165)
65	Aug-11				(105,320)			0		(105,320)	(14,770,486)
66	Sep-11				(106,077)			0		(106,077)	(14,876,562)
67	Oct-11				(106,839)			0		(106,839)	(14,983,401)
68											
69											
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76											
77											

Amount Deferred Nov 10 - Oct 11 with interest: (14,983,400.76)

History truncated for ease of viewing

NOTES:

1/ - Transfer to amortization account 191401

2/ - Adjustment for storage true up

EXHIBIT A

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Core Market Demand cost deferral
 Account Number: 191.410
 Current docket is UM 1496
 Current Reauthorization was granted in Order No. 10-442

Narrative: Deferral of 100% of the Difference between actual demand cost incurred and the demand cost embedded as defined in the related state's annual PGA.

1	Debit		(Credit)							
2					Demand	8.618%			Deferral	
3	Month/Year		Refer to pg #		Deferral	Interest*	Adjustment	Transfer	Activity	GL Balance
4	(a)	(b)	(c)		(d)	(e)	(f)	(g)	(h)	(i)
5										
46	Jan-10				226,245	(752)			225,493	7,645
47	Feb-10				119,566	484			120,050	127,695
48	Mar-10				594,213	3,051			597,264	724,959
49	Apr-10				509,075	7,034			516,109	1,241,068
50	May-10				321,943	10,069			332,012	1,573,080
51	Jun-10				440,773	12,880			453,653	2,026,733
52	Jul-10				364,593	15,865			380,458	2,407,191
53	Aug-10				328,989	18,469			347,458	2,754,649
54	Sep-10				451,636	21,405			473,041	3,227,690
55	Oct-10				319,167	24,326			343,493	3,571,183
56	Nov-10	A/			512,707	1,841		(3,571,183)	(3,056,635)	514,548
57	Dec-10				(316,979)	2,557			(314,422)	200,126
58	Jan-11				96,057	1,782			97,839	297,966
59	Feb-11				241,984	3,009			244,993	542,958
60	Mar-11				219,512	4,688			224,200	767,158
61	Apr-11				247,356	6,398			253,754	1,020,912
62	May-11				(39,651)	7,189			(32,462)	988,450
63	Jun-11				364,391	8,407			372,798	1,361,248
64	Jul-11				266,897	10,734			277,631	1,638,880
65	Aug-11					11,770			11,770	1,650,650
66	Sep-11					11,854			11,854	1,662,504
67	Oct-11					11,940			11,940	1,674,444

Amount Deferred Nov 10 - Oct 11 with interest: 1,674,443.59

* No interest is applied to this activity until the 2007-2008 Tracker period

History truncated for ease of viewing

NOTES

A/Transfer to amortization account 191411

EXHIBIT A

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Core Market Demand Collection Deferral
 Account Number: 191.450
 Current docket is UM 1496
 Current Reauthorization was granted in Order No. 10-442

Narrative: Deferral of 100% of the difference between actual demand costs collected and the seasonalized embedded demand costs as defined in the state's annual PGA.

1	Debit	(Credit)								Deferral	
2										Plus Int.	
3	Month/Year	Note	Refer to pg #	Demand	8.618%		Transfer		Activity	GL Balance	
4	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	
5											
46	Jan-10			2,426,982	(1,601)				2,425,381	988,968	
47	Feb-10			2,018,891	14,352				2,033,243	3,022,212	
48	Mar-10			427,365	23,239				450,604	3,472,816	
49	Apr-10			(527,889)	23,045				(504,844)	2,967,972	
50	May-10			(634,421)	19,037				(615,384)	2,352,587	
51	Jun-10			(566,552)	14,861				(551,691)	1,800,896	
52	Jul-10			(237,583)	12,080				(225,503)	1,575,393	
53	Aug-10			(319,222)	10,168				(309,054)	1,266,339	
54	Sep-10			(154,135)	8,541				(145,595)	1,120,745	
55	Oct-10			652,039	10,390				662,429	1,783,174	
56	Nov-10	1		(774,261)	(2,780)		(1,783,174)		(2,560,215)	(777,041)	
57	Dec-10			1,587,140	119				1,587,259	810,218	
58	Jan-11			800,350	8,693				809,042	1,619,260	
59	Feb-11			(1,013,999)	7,988				(1,006,011)	613,249	
60	Mar-11			(798,925)	1,535				(797,390)	(184,141)	
61	Apr-11			(1,367,972)	(6,235)				(1,374,206)	(1,558,347)	
62	May-11			(964,901)	(14,656)				(979,557)	(2,537,904)	
63	Jun-11			(375,285)	(19,574)				(394,859)	(2,932,763)	
64	Jul-11			(301,283)	(22,144)				(323,427)	(3,256,190)	
65	Aug-11				(23,385)				(23,385)	(3,279,575)	
66	Sep-11				(23,553)				(23,553)	(3,303,128)	
67	Oct-11				(23,722)				(23,722)	(3,326,850)	
68											
69				Amount Deferred Nov 10 - Oct 11 with interest:						(3,326,849.77)	

* No interest is applied to this activity until the 2007-2008 Tracker period

History truncated for ease of viewing

NOTES

1 - transfer to Amorization account 191411



August 31, 2011

**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 continue deferrals relative to the Company's annual purchased gas cost adjustment and 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 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.

* * * * *



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER CERTAIN EXPENSES OR REVENUES upon all parties who participated in the Company's most recent general rate case (UG 152), by U.S. mail, postage prepaid, or where paper service is waived, by electronic mail.

UG 152

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DATED at Portland, Oregon, this 31st of August 2011.

/s/ Kelley C. Miller
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