

McDowell Rackner & Gibson PC



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January 21, 2011

VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UG 170 (4)

Enclosed for filing in Docket UG 170(4) are an original and five copies of the Testimony in Support of the Stipulation, Motion to Admit Stipulation and Prefiled Testimony and Exhibits, and the affidavits of Gordon Feighner, Paula Pyron, and Linda Deckard. A copy of this filing has been served on all parties to this proceeding as indicated on the enclosed service list.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo

Enclosure

cc: Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UG 170 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

G. Catriona McCracken
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Regulated & Utility Business Section
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Edward A. Finklea
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Paula E. Pyron
Northwest Industrial Gas Users
ppyron@nwigu.org

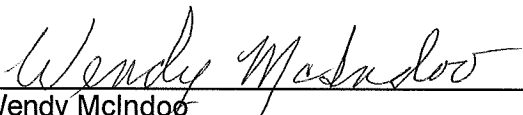
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DATED: January 21, 2011



Wendy McIndoo
Office Manager

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 170

In the Matter of:

NORTHWEST NATURAL

Filing of tariffs establishing automatic
adjustment clauses under the terms of
SB 408

JOINT TESTIMONY IN SUPPORT OF STIPULATION

WITNESSES:

CARLA BIRD

GORDON FEIGHNER

PAULA PYRON

LINDA DECKARD

January 21, 2010

Joint Testimony in Support of Stipulation

1 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.**

2 A. My name is Carla Bird. I am a Senior Revenue Requirement Analyst in the Rates and
3 Tariffs section of the Electric and Natural Gas Division of the Public Utility Commission of
4 Oregon ("OPUC") Staff. My business address is 550 Capital Street NE, Suite 215, Salem,
5 Oregon 97301-2551. My qualifications appear in Joint Stipulating Exhibit 101.

6 My name is Gordon Feighner. I am a Utility Analyst with the Citizens' Utility Board of
7 Oregon ("CUB"). My business address is 610 SW Broadway, Suite 400, Portland, Oregon
8 97205. My qualifications appear in Joint Stipulating Exhibit 102.

9 My name is Paula E. Pyron. I am an energy law attorney and serve as the executive
10 director of the Northwest Industrial Gas Users ("NWIGU"). My business address is 4113
11 Wolf Berry Court, Lake Oswego, OR 97035-1827. My qualifications appear in Joint
12 Stipulating Exhibit 103.

13 My name is Linda Deckard. I am the Tax Manager with Northwest Natural Gas
14 Company. My business address is 220 NW 2nd Ave, Portland, Oregon 97209. My
15 qualifications appear in Joint Stipulating Exhibit 104.

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. NW Natural ("NW Natural" or the "Company"), Staff of the Public Utility Commission of
18 Oregon ("Staff"), the Citizens' Utility Board of Oregon ("CUB"), and Northwest Industrial
19 Gas Users, ("NWIGU") (collectively, the "Stipulating Parties") provide this testimony in
20 support of the Stipulation filed in Docket UG 170(4), regarding NW Natural's tax filing as it
21 relates to the application of Senate Bill 408 ("SB408") covering calendar year 2009.

22 **Q. HOW IS SB 408 CODIFIED AND IMPLEMENTED BY THE OPUC?**

23 A. SB 408 is codified as ORS 757.267 and 757.268. The Commission issued OAR 860-022-
24 0041 to implement SB 408. Pursuant to this rule, NW Natural filed its Tax Report for
25 calendar years 2007, 2008, and 2009 ("Tax Report") on October 15, 2010.

1 **Q. PLEASE DESCRIBE THE ACTIVITY THAT HAS OCCURRED IN THIS PROCEEDING.**

2 A. The Stipulating Parties conducted a workshop on November 4, 2010. In addition, Staff
3 has made several discovery requests to clarify aspects of NW Natural's SB 408 Tax
4 Report. On December 23, 2010, Staff filed an issues list which is attached as Joint
5 Stipulating Exhibit 105.

6 The Stipulating Parties have agreed to the terms of this Stipulation and submit the
7 Stipulation, along with this Joint Testimony in support of the Stipulation, to the
8 Commission. The Parties request that the Commission issue an order approving the
9 Stipulation and implementing its terms.

10 **Q. DID NW NATURAL MODIFY ITS TAX REPORT FOR 2009 AS A RESULT OF THE**
11 **ACTIVITY THAT OCCURRED IN THIS PROCEEDING?**

12 A. Yes. NW Natural made a revision to correct a clerical error in the reporting of its tax
13 liability. This revision resulted in a change to NW Natural's surcharge of approximately
14 \$3,300. NW Natural's final revised Tax Report for 2009, filed with the Commission,
15 reflects these revisions and, thus, the terms of the Stipulation.

16 **Q. IN CONSIDERATION OF THE REVISIONS SUBMITTED BY NW NATURAL IN ITS**
17 **REVISED TAX REPORT, WHAT IS THE FINAL OUTCOME OF ITS 2009 SB 408**
18 **FILING?**

19 A. The final outcome of the 2009 SB 408 filing results in a surcharge of \$5.1 million (before
20 interest) based on the difference between state and federal taxes paid and taxes
21 authorized to be collected in rates, and a refund of approximately \$371,000 based on the
22 difference between local taxes collected in rates and local taxes paid to units of
23 government.

24 **Q. HOW DO THE STIPULATING PARTIES PROPOSE THAT THE DIFFERENCE**
25 **BETWEEN TAXES PAID AND TAXES AUTHORIZED BE REFLECTED IN NW**
26 **NATURAL'S RATES?**

1 A. The rate adjustment for NW Natural's 2009 SB 408 filing will be a rate surcharge. After
2 removing the current 2008 amortization of a surcharge, NW Natural estimates that for a
3 typical residential customer, the state/federal surcharge will lead to a 1.0% overall rate
4 increase and the local refund will lead to less than a 0.2% overall rate decrease. The
5 Stipulating Parties agree that the surcharge for state and federal taxes should be
6 amortized for a 12-month period through Schedule 161, NW Natural's Income Tax
7 Adjustment Tariff effective with customer bills issued beginning June 1, 2010 through May
8 31, 2011. The Parties agree that the refund related to local tax should be applied to
9 customer bills under the terms and conditions stated in NW Natural's Schedule 161A.

10 **Q. PLEASE PROVIDE AN ESTIMATE OF THE INTEREST THAT HAS ACCRUED FROM**
11 **JULY 2008 FOR BOTH THE FEDERAL AND STATE SURCHARGE AND THE LOCAL**
12 **REFUND.**

13 A. Following is a summary of NW Natural's forecast of interest through the deferral and
14 amortization periods:

15 **Table 1**
16 **Amortization Summary**
17 **NW Natural 2009 Tax Report**

	<u>State / Federal</u>	<u>Local</u>
18 Surcharge (Refund)	\$ 5,126,523	(\$ 370,916)
19 Estimated interest through May 2011	\$ 874,078	(\$ 63,242)
20 Estimated interest June 2011 – May 2012 *	<u>\$ 65,532</u>	<u>(\$ 4,741)</u>
21 Estimated amount to amortize	<u>\$ 6,066,133</u>	<u>(\$ 438,899)</u>

22 * Blended treasury rate of 2.01% calculated by NW Natural per the methodology
prescribed by Order No. 08-263 in Docket UM 1147.

23 **Q. DO THE STIPULATING PARTIES AGREE THAT THE REVISED TAX REPORT**
24 **COMPLIES WITH THE APPLICABLE COMMISSION RULES?**

25 A. Yes.

1 Q. DO THE STIPULATING PARTIES AGREE THAT THE STIPULATION PROVIDES A
2 REASONABLE OUTCOME IN THIS PROCEEDING?

3 A. Yes.

4 Q. DO THE STIPULATING PARTIES AGREE THAT THE ADJUSTMENT AMOUNTS
5 RESULTING FROM THE REVISED TAX REPORT WILL RESULT IN FAIR, JUST AND
6 REASONABLE RATES?

7 A. Yes.

8 Q. DO THE STIPULATING PARTIES REQUEST THAT THE COMMISSION APPROVE THE
9 STIPULATION AND RULE THAT THE RESULTING RATES ARE FAIR, JUST AND
10 REASONABLE?

11 A. Yes.

12 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

13 A. Yes.

WITNESS QUALIFICATION STATEMENT

NAME: Carla M. Bird
EMPLOYER: Public Utility Commission of Oregon
TITLE: Senior Utility Analyst/Revenue Requirement/Rates and Regulation
ADDRESS: 550 Capitol Street NE Suite 215
Salem, Oregon 97301-2115.

EDUCATION: Professional Accounting Degree
Trend College of Business 1983

EXPERIENCE: I have been employed by the Public Utility Commission of Oregon since April of 2001. I am the Senior Utility Analyst for revenue requirement for the Rates and Regulation Division of the Utility Program. Current responsibilities include leading research and providing technical support on a wide range of policy issues for electric, telecommunications, and gas utilities.

From September 1994 to April 2001, I worked for the Oregon Department of Revenue as a Senior Industrial/Utility Appraiser. I was responsible for the valuation of large industrial properties as well as utility companies throughout the State of Oregon.

I have testified on behalf of the Public Utility Commission in Docket Nos. UE 180, UM 1234, UE 167, UE 180, UE 188, UM 1234, UM 1261, UM 1271 and UG 171.

OTHER EXPERIENCE: I received my certification from the National Association of State Boards of Accountancy in the Principles of Public Utilities Operations and Management in March of 1997. I have attended the Institute of Public Utilities sponsored by the National Association of Regulatory Utility Commissioners at Michigan State University in August of 2002 and the College of Business Administration and Economics at New Mexico State University's Center for Public Utilities in May of 2004.

WITNESS QUALIFICATION STATEMENT

NAME: Carla M. Bird
EMPLOYER: Public Utility Commission of Oregon
TITLE: Senior Utility Analyst/Revenue Requirement/Rates and Regulation
ADDRESS: 550 Capitol Street NE Suite 215
Salem, Oregon 97301-2115.

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EXPERIENCE: I have been employed by the Public Utility Commission of Oregon since April of 2001. I am the Senior Utility Analyst for revenue requirement for the Rates and Regulation Division of the Utility Program. Current responsibilities include leading research and providing technical support on a wide range of policy issues for electric, telecommunications, and gas utilities.

From September 1994 to April 2001, I worked for the Oregon Department of Revenue as a Senior Industrial/Utility Appraiser. I was responsible for the valuation of large industrial properties as well as utility companies throughout the State of Oregon.

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OTHER EXPERIENCE: I received my certification from the National Association of State Boards of Accountancy in the Principles of Public Utilities Operations and Management in March of 1997. I have attended the Institute of Public Utilities sponsored by the National Association of Regulatory Utility Commissioners at Michigan State University in August of 2002 and the College of Business Administration and Economics at New Mexico State University's Center for Public Utilities in May of 2004.

WITNESS QUALIFICATION STATEMENT

NAME: Gordon Feighner

EMPLOYER: Citizens' Utility Board of Oregon (CUB)

TITLE: Utility Analyst

ADDRESS: 610 SW Broadway, Suite 400
Portland, OR 97205.

EDUCATION: Master of Environmental Management, 2005
Duke University, Durham, NC

Bachelor of Arts, Economics, 2002
Reed College, Portland, OR

EXPERIENCE: I have previously provided testimony in dockets UE 196, UE 204, UE 210, UE 213, UM 1355, UM 1431, and UM 1484. Between 2004 and 2008, I worked for the US Environmental Protection Agency and the City of Portland Bureau of Environmental Services, conducting economic and environmental analyses on a number of projects. In January 2009 I joined the Citizens' Utility Board of Oregon as a Utility Analyst and began conducting research and analysis on behalf of CUB.

WITNESS QUALIFICATION STATEMENT

Paula E. Pyron

Paula Pyron is the Executive Director of the Northwest Industrial Gas Users ("NWIGU"), with its business address at 4113 Wolf Berry Court, Lake Oswego, OR 97035-1827. NWIGU is a nonprofit association of 38 large end-users of natural gas with facilities in Oregon, Washington and Idaho. The association represents its members' interests in distributor and pipeline rate cases, tariff filings and regulatory policy issues in the three states and at the Federal Energy Regulatory Commission. Ms. Pyron accepted this representation of NWIGU effective September 2000.

Ms. Pyron has been a lawyer since 1983, hailing from the oil patch in Tulsa, Oklahoma for the first several years of her business-focused practice with the law firm of Boesche, McDermott & Eskridge. She began private practice in Portland, Oregon in 1991 with an emphasis in energy regulation and contract negotiation. She represented Northwest Industrial Gas Users from 1991 to 1999 as one of its outside counsel, most recently as a partner at Energy Advocates LLP, and prior to that firm's founding was a partner at Ball Janik LLP. Immediately prior to her engagement as NWIGU's executive director, from 1999 to 2000, she managed the legal department in Portland as Assistant General Counsel for PG&E Gas Transmission, Northwest Corporation.

Ms. Pyron is admitted to practice in the state bars of Oregon and Oklahoma and numerous federal courts. She is a 1983 graduate of the University of Tulsa, College of Law and has a BS in Economics, *summa cum laude* from the University of Texas at Dallas. She has testified on energy regulatory and legislative matters in Oregon and Washington before the Oregon Public Utility Commission (OPUC), the Washington Utilities and Transportation Commission (WUTC), and state legislative committees. She has appeared on numerous occasions before the WUTC, the OPUC and the Idaho Public Utility Commission as executive director of NWIGU.

WITNESS QUALIFICATION STATEMENT

NAME: Linda Deckard

EMPLOYER: Northwest Natural Gas Company ("NW Natural")

TITLE: Tax Manager

ADDRESS: 220 NW Second Avenue
Portland OR 97209

EDUCATION: B.S., California State University at Fullerton; Major: Psychology
Certificate in Accounting from Portland State University

EXPERIENCE: I first joined NW Natural in 1999 as an SEC/Tax Analyst. In this position, I was responsible for preparation of the Company's quarterly 10-Q and annual 10-K filings with the Securities and Exchange Commission, in addition to handling all income tax matters relevant to the Company. In 2005, I transitioned my SEC responsibilities to another employee of NW Natural in order to function full time as the Company's Tax Manager.

Prior to joining NW Natural, I was employed by Perkins & Company, PC for a period of ten years. During my term with Perkins & Company, I received my CPA designation in 1991, functioned in both audit and tax and advanced to a Tax Manager position.

I received my BS degree in Psychology from California State University at Fullerton and later a Certificate in Accounting from Portland State University.



Oregon

Theodore R. Kulongoski, Governor

Joint Parties/105
Bird/Feighner/Pyron/Deckard/1

Public Utility Commission

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Mailing Address: PO Box 2148

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December 23, 2010

Via Electronic Filing and U.S. Mail

OREGON PUBLIC UTILITY COMMISSION
ATTENTION: FILING CENTER
PO BOX 2148
SALEM OR 97308-2148

**RE: Docket No. UG 170 (4) – In the Matter of NORTHWEST NATURAL GAS
COMPANY Senate Bill 408 Tax Filing for 2009 Tax Period.**

Enclosed for electronic filing in the above-captioned docket is the Public Utility
Commission's Staff Issues List.

/s/ Kay Barnes

Kay Barnes

Regulatory Operations Division

Filing on Behalf of Public Utility Commission Staff

(503) 378-5763

Email: kay.barnes@state.or.us

c: UG 170 Service List (parties)

**PUBLIC UTILITY COMMISSION
OF OREGON**

UG 170 (4)

**STAFF ISSUES LIST
CARLA BIRD
DUSTIN BALL
DEBORAH GARCIA**

**In the Matter of
NORTHWEST NATURAL GAS COMPANY
Senate Bill 408 Tax Filing for 2009 Tax Period**

December 23, 2010

**SENATE BILL 408, TAX FILINGS
STAFF'S INITIAL FINDINGS
FOR NORTHWEST NATURAL GAS COMPANY – UG 170(4)**

TO: LEE SPARLING, MAURY GALBRAITH, JUDY JOHNSON AND
JASON JONES

RE: NW NATURAL – UG 170(4)
SB 408 TAX FILINGS
2009 TAX PERIOD

FROM: CARLA BIRD, SENIOR UTILITY ANALYST
DUSTIN BALL, SENIOR UTILITY ANALYST,
DEBORAH GARCIA, SENIOR UTILITY ANALYST
PUBLIC UTILITY COMMISSION

DATE: DECEMBER 23, 2010

CC: ALL PARTIES

On October 15, 2010, Northwest Natural Gas Company (NW Natural or Company) filed UG 170(4), its tax report covering the 2009 calendar year pursuant to Senate Bill 408 (SB 408) (codified at ORS 757.267, 757.268 and OAR 860-022-0041).

Much of the information contained in these tax reports represents highly confidential and sensitive information. Staff has structured its initial findings in this report in a generic manner in order to avoid the possibility of disclosing confidential, or sensitive, information.

Staff has thoroughly reviewed each calculation and all documentation provided by the Company.

SUMMARY OF 2009 SB 408 IMPACT:

NW Natural reports the following for its Oregon Regulated Operations during the 2009 Tax period:

Table 1

Federal and State Taxes Paid to units of Government	Taxes Collected	Surcharge or (Refund)	Interest¹ (7/1/09 through 6/1/2011)	Total Surcharge
\$35.9 million	\$30.8 million	\$5.1 million	\$0.9 million	\$6.0 million
Local Taxes Paid to units of Government	Taxes Collected	Surcharge or (Refund)	Interest² (7/1/09 through 6/1/2011)	Total Refund
\$84,000	\$455,000	(\$371,000)	\$63,000	(\$434,000)

NW Natural's original filing reflected a total surcharge related to the Federal and State tax true-up for the 2009 tax period to be \$6.0 million including interest through the deferral period. *Staff's recommendation for NW Natural's 2009 SB 408 filing relates to a clerical error in the Company's filing that results in a difference of only \$3,300. NWN has agreed to the change and has filed an amended return.*

NWN forecasts additional interest of approximately \$73,000 that will accrue during the amortization period based upon the current blended treasury rate. This estimate will be updated prior to rate implementation June 1, 2011 based upon the 2011 Blended Treasury rate that will be calculated in January of 2011.

For local taxes, ratepayers in Multnomah County will receive a refund of approximately \$434,000 coincident with the surcharge that will be implemented for the State and Federal taxes resulting in a slight decrease in the overall surcharge for customers residing in Multnomah County.

¹ This is an estimate of all interest that would apply through the deferral period.

² This is an estimate of all interest that would apply through the deferral period.

The impact of NW Natural's surcharge represents an increase to NW Natural's 2009 retail rates of approximately 0.7 percent. NW Natural relied upon the stand-alone method for the outcome of its 2009 SB 408 filing.

For the 2008 tax period, NW Natural surcharged approximately \$340,000³.

The implementation of the SB 408 surcharge coincides with an interstate storage credit that NW Natural refunds in June on an annual basis, therefore, as in previous years; there will be only a one-month rate impact to implement SB 408.

*At the conclusion of Staff's review and after some of the Parties⁴ had reached an agreement in principle for settlement Staff discovered a potential inconsistency between SB 408 and OAR 860-022-0041. The inconsistency involves the manner for determining the existence of a normalization violation⁵ under (4)(d) of the commission rule and under Staff's template. The impact of improperly applying the normalization violation test (on Page 8 of Staff's template) would not impact NWN's 2009 SB408 filing. Since Staff's only recommendation in this case was to correct a clerical error, and the Company has willingly agreed, **Staff recommends that we proceed to drawing a Stipulation with NWN and the participating Parties.***

Upon discovering this issue, Staff immediately consulted with the Assistant Attorney General's (AAG or Staff's Counsel) office and our upper management team. As a result of those discussions, Staff requested a delay of six days from December 17, 2010 to December 23, 2010 to publish this issues list. In addition, Staff and its Counsel held phone discussions with each of Utility companies as well as the Parties represented at the Settlement conference⁶ to notify them of the potential impacts of this issue. Staff also informed the Parties that we could not go forward with the initial agreements made at the Settlement Conferences.

The basis of the Staff recommendation in this report outlines the foundation of Staff's findings and agreements made in Settlement discussions. Most importantly, these recommendations are based upon rule implementation prior to Staff's discovery of the issue described above.

Staff is in the process of investigating the validity of the assumption that the rules and Staff's template conflict with the original intent of the test for a Normalization Violation. If Staff concludes there is a conflict in the rules and Staff's template from the intent of SB408, then the findings in the report below

³ This amount includes interest during the deferral period and through amortization as well as a residual balance from the prior year.

⁴ The Parties to the Stipulated Agreements are defined in the section "Summary of Review" section on Page 4 below.

⁵ Discussed in section "Staff Review" on page 5 below.

⁶ Id.

would change significantly. Staff's Testimony is scheduled to be published on January 11, 2011 which would incorporate the findings of Staff's investigation into this matter. If Staff's investigation concludes that there is no conflict between the current rules and Normalization Violations, Staff will likely propose settlement based upon the original agreements described below.

STAFF REVIEW:

Staff conducted interviews with the Company, requested supplemental work papers, and conducted several phone interviews. Staff also conducted a face-to-face conference with the Company on November 4, 2010. In attendance were the Citizens' Utility Board (CUB) and the Northwest Customers of Industrial Gas Utilities (NWIGU) (collectively referred to as the Parties).

Staff thoroughly reviewed NWN's filing, its calculations and the methods employed to determine taxes paid, as well as taxes collected.

As a result of Staff's review, Staff requested that NW Natural correct a clerical error discovered by Staff in the filing. The amendment reduces the surcharge proposed in the original filing by approximately \$3,300. NWN has agreed to the change and filed an amended report on December 1, 2010.

The Parties have agreed in principal that with the correction of the clerical error the amount results in a just and reasonable outcome for NWN's 2009 SB408 filing. The Parties are currently drafting a Stipulation and Joint Testimony to be filed before the Commission no later than January 10, 2011.

UG 170
Service List (Parties)

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DANIEL W MEEK ATTORNEY AT LAW DANIEL W MEEK (C) (HC) ATTORNEY AT LAW	 10949 SW 4TH AVE PORTLAND OR 97219 dan@meek.net
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ENERGY ACTION NORTHWEST EDWARD A FINKLEA (W)	 PO BOX 8308 PORTLAND OR 97207 efinklea@energyactionnw.org
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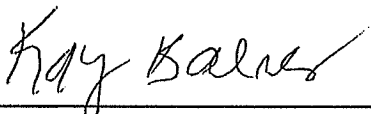
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LISA F RACKNER	419 SW 11TH AVE., SUITE 400 PORTLAND OR 97205 lisa@mcd-law.com
NORTHWEST INDUSTRIAL GAS USERS PAULA E PYRON (C) (HC) (W)	4113 WOLF BERRY CT LAKE OSWEGO OR 97035-1827 ppyron@nwigu.org
NORTHWEST NATURAL ONITA KING (W)	220 NW 2ND AVE PORTLAND OR 97209-3991 ork@nwnatural.com
NW NATURAL RATES & REGULATORY AFFAIRS (W)	220 NW 2ND AVE PORTLAND OR 97209-3991 efilling@nwnatural.com
OREGON PUBLIC UTILITY COMMISSION CARLA BIRD (C) (HC)	PO BOX 2148 SALEM OR 97308-2148 carla.blrd@state.or.us
PUBLIC UTILITY COMMISSION OF OREGON DEBORAH GARCIA (C) (HC)	PO BOX 2148 SALEM OR 97308-2148 deborah.garcia@state.or.us
STOEL RIVES LLP MARCUS A WOOD	900 SW FIFTH AVE - STE 2600 PORTLAND OR 97204 mwood@stoel.com

CERTIFICATE OF SERVICE

UG 170

I certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-001-0180, to the following parties or attorneys of parties.

Dated this 23rd day of December 2010, at Salem, Oregon.



Kay Barnes
Public Utility Commission
Regulatory Operations
550 Capitol St NE Ste 215
Salem, Oregon 97301-2551
Telephone: (503) 378-5763

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 170(4)

In the Matter of:

NORTHWEST NATURAL
Filing of tariffs establishing automatic
adjustment clauses under the terms of
SB 408

AFFIDAVIT OF GORDON
FEIGHNER

I, Gordon Feighner, being first duly sworn on oath, depose and say:

1. My name is Gordon Feighner. I am a Utility Analyst with the Citizens' Utility Board of Oregon ("CUB").
2. I am filing testimony and associated exhibits (Joint Testimony in Support of Stipulation/100, 102, 105 ^{WM per authorization} and ~~106~~) on behalf of CUB in this matter.
3. To the best of my knowledge, my testimony is true and accurate.

SIGNED this 14 day of January, 2011.



GORDON FEIGHNER

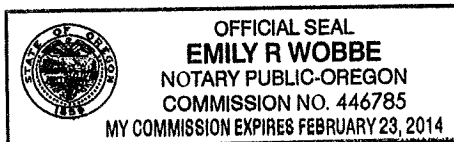
SUBSCRIBED AND SWORN to before me this 14 day of January, 2011.



Notary Public for Oregon

My Commission Expires:

2/23/2014



BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 170(4)

In the Matter of
NORTHWEST NATURAL
Filing of tariffs establishing automatic
adjustment clauses under the terms of SB
408

AFFIDAVIT OF
LINDA DECKARD

STATE OF OREGON)
) ss
County of Multnomah)

I, Linda Deckard, being first duly sworn on oath, depose and say:

1. My full name is Linda Deckard. I am employed as the Tax Manager for Northwest Natural Gas Company.

2. I am filing testimony and associated exhibits (Joint Testimony in Support of Stipulation 100, 104, 105, ^{and 106} ~~and 106~~) ^{WM/per authorization} on behalf of Northwest Natural

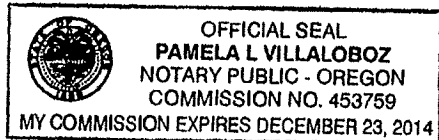
3. My pre-filed testimony and exhibits are true and accurate based on my information and belief.

SIGNED this 20 day of January, 2011, at Portland, Oregon.

Signed: Linda Deckard

SUBSCRIBED AND SWORN to before me this 20th day of January, 2011.

Pamela L. Villalobo
Notary Public, State of Oregon
My Commission Expires 12.23.2014



BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 170(4)

In the Matter of)
)
)
PUBLIC UTILITY COMMISSION OF)
OREGON STAFF directing NORTHWEST)
NATURAL GAS COMPANY, dba NW)
NATURAL, to file tariffs establishing)
automatic adjustment clauses under the terms)
of SB 408.)

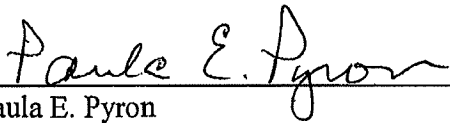
AFFIDAVIT OF PAULA E. PYRON

STATE OF OREGON)
) ss
County of Multnomah)

I, Paula Pyron, being first duly sworn on oath, depose and say:

1. I am the Executive Director of the Northwest Industrial Gas Users ("NWIGU").
2. On behalf of NWIGU, I sponsored the pre-filed testimony submitted in this docket entitled Joint Testimony/Bird-Feighner-Pyron-Deckard.
3. My statements in the pre-filed testimony are true and accurate based on my information and belief and my responses would be the same if I were to answer those same questions today.

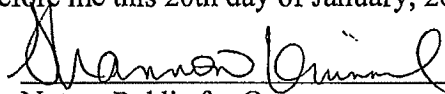
SIGNED this 20th day of January, 2011.



Paula E. Pyron

SUBSCRIBED AND SWORN to before me this 20th day of January, 2011.





Notary Public for Oregon
My Commission Expires: JUNE 25, 2013