

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 221

In the Matter of)	
)	
NORTHWEST NATURAL GAS COMPANY)	
dba NW NATURAL)	CUB’S LIST OF EXHIBITS TO BE
)	ENTERED INTO THE RECORD
Request for a General Rate Revision)	
_____)	

CUB Pre-Filed Exhibits in UG 221

- Exhibit CUB/100 Opening Testimony of the Citizens’ Utility Board of Oregon
- Exhibit CUB/101 Witness Qualification Statement
- Exhibit CUB/102 Incentive Compensation Adjustment
- Exhibit CUB/103 Tab Working Gas Inventory
- Exhibit CUB/200 Rebuttal Testimony of the Citizens’ Utility Board of Oregon
- Exhibit CUB/201 LIHEAP: Meeting Needs in Oregon

CUB Exhibits to Offer into the Record

CUB’s Exhibits to Offer into the Record			
CUB/300	Jenks-Feighner	CUB	Response to OPUC DR 179
CUB/301	Jenks-Feighner	CUB	Response to OPUC DR 341
CUB/302	Jenks-Feighner	CUB	Response to NWIGU-CUB DR 8
CUB/303	Jenks-Feighner	CUB	Response to NWIGU-CUB DR 177

Dated this 20th day of August, 2012.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. C. M.", with a long horizontal flourish extending to the right.

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UG 221 – CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of August, 2012, I served the foregoing **CUB'S LIST OF EXHIBITS TO BE ENTERED INTO THE RECORD** in docket UG 221 upon each party listed in the UG 221 Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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Respectfully submitted,



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Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR1-OPUC-DR 179:

Is the proposed amortization of environmental remediation costs in the UG 221 revenue requirement?

- a. If yes, please show where it can be found in NWN/300.

Response: 1/30/2012

The proposed amortization of environmental remediation costs is not included in the proposed revenue requirement. The proposed recovery of environmental remediation costs described in NWN/1500 is a separate mechanism that would amortize deferred amounts through a temporary adjustment set each year during the PGA. As such, amortization of these amounts is not included in the proposed revenue requirement.



Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR1-OPUC-DR 341:

Did the Commission previously authorize the bare steel portion of the MWVF under the SIP, the new MWVF additions described in Yoshihara/4-5, and the Corvallis Loop Project described in Yoshihara 2-4? If yes, provide Commission Orders authorizing these projects.

Response: 2/23/2012

The Commission has not previously authorized any of the specific projects listed above. The replacement of bare steel is a part of the System integrity Program (SIP) which is authorized under Order No. 09-067.



Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR1-NWIGU-CUB-DR 8:

Environmental Cleanup. Provide excerpts from the Commission orders which support the Company's proposed treatment of environmental cleanup costs.

Response: 3/19/2012

The Company objects to this request on the basis that it requests a legal opinion. Without waiving this objection, the Company provides the following brief discussion of relevant Commission precedent.

NW Natural is not aware of an order in which the Oregon Public Utility Commission where the Commission has considered the appropriate rate treatment for environmental remediation costs. However, the Commission has authorized NW Natural to defer the costs associated with environmental remediation for consideration for future recovery through rates. See, for example, Order No. 11-336 (Aug. 30, 2011) (adopting Staff's recommendations and approving NW Natural's application for reauthorization to defer unrecovered environmental costs). See also *id.*, App. A, p. 1 (Staff description of the history of the deferrals and the projects to which they relate).

NW Natural notes that the Commission allows recovery through rates for prudently incurred expenses, and that the Commission has the authority to adopt rates and rate mechanisms that are tailored to result in an appropriate collection of costs, such as the mechanism that NW Natural has proposed. See, for example, Order No. 08-487, p. 5 (Sep. 30, 2008) ("The Commission sets rates under a comprehensive and flexible regulatory scheme. The legislature has expressed no specific process or method the Commission must use to determine the level of just and reasonable rates, and the Commission has great freedom to determine which of the many possible methods it will use.").



Rates & Regulatory Affairs

Oregon General Rate Case – December 2011

Data Request Response

Request No. GR1-NWIGU-CUB-DR 177:

Provide the Company’s actual and authorized rate of return and actual and authorized return on equity for each year 2002-2011.

Response: 7/12/2012

Please see table below. Returns are per the Company’s filed annual Results of Operations Reports and exclude WACOG sharing.

	Oregon Rate of Return reported	Rate of Return authorized	Oregon ROE reported	ROE authorized
2002	8.39%	8.91%	9.40%	10.25%
2003	7.56%	8.62%	8.06%	10.20%
2004	8.35%	8.62%	9.49%	10.20%
2005	8.38%	8.62%	9.77%	10.20%
2006	8.63%	8.62%	10.31%	10.20%
2007	8.60%	8.62%	10.17%	10.20%
2008	9.04%	8.62%	10.91%	10.20%
2009	8.11%	8.62%	9.36%	10.20%
2010	8.71%	8.62%	10.95%	10.20%
2011	8.58%	8.62%	10.88%	10.20%