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November 22, 2021

NWN OPUC Advice No. 21-18

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Post Office Box 1088  
Salem, Oregon 97308-1088

**Re: Winter 2022 Bill Adjustments—Schedule 185 Special Annual Interstate Storage and Transportation Credit; and Schedule 186 Special Annual Core Storage and Pipeline Capacity Optimization Credit**

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following tariff sheets stated to become effective with service on and after January 1, 2022:

Twelfth Revision of Sheet 185-1	Schedule 185	Special Annual Interstate Storage and Transportation Credit
Twelfth Revision of Sheet 186-1	Schedule 186	Special Annual Core Storage and Pipeline Capacity Optimization Credit

**Purpose**

The purpose of this filing is to revise Schedule 185 and Schedule 186, respectively, to reflect the per-therm credit used to calculate the lump sum amount to be applied to the bills of customers served under Rate Schedules 2 and 3, and under the Sales Service option of Schedules 31 and 32.

**Background**

Historically, the Schedule 185 and 186 bill credits get applied to customer bills in the month of February. However, the Company proposes for 2022 that the lump sum February bill credit be applied to customer bills over a three-month period commencing with the first billing cycle in January 2022 and ending with the last billing cycle in March 2022. Due to the historically high revenues from the Company's core pipeline capacity optimization activities that are passed back to customers through Schedule 186, NW Natural is proposing to provide sustained relief through the winter heating season (January – March) in lieu of the normal lump-sum credit in February only. The Company has consulted with parties to previous dockets where optimization credits have been an issue, including the recent agreement in docket UG 388, and all parties have supported this proposal.

The bill credits will be calculated based on the customer's actual billed gas usage for the period November 1, 2020 through October 31, 2021. In order to receive the bill credits, a customer must have an active gas service account at the time of the customer's January 2022 billing cycle.

### **Schedule 185**

The Schedule 185 credits represent the credit of the Oregon share of revenues NW Natural received for interstate storage and related transportation service activities under a Limited Jurisdiction Blanket Certificate granted under FERC Regulations, 18 C.F.R. 294.224. The refund of \$3,982,772 (before revenue sensitive effects) is comprised of \$3,976,265 from revenues for November 2020 through October 2021 activity, plus \$6,507 that is the residual remaining balance from the February 2021 credits.

Schedule 185 amounts are calculated on an equal percentage of margin basis. The Schedule 185 credits will reduce January through March 2022 customer bills for average customer usage from the November 2020 through October 2021 period indicated as follows:

- The average Schedule 2 Residential Customer that used about 598 therms will see a bill credit of about \$1.58.
- The average Schedule 3 Commercial Customer that used about 2,845 therms will see a bill credit of about \$5.41.
- The average Schedule 31 Commercial Firm Sales customer that used about 33,009 therms will see a bill credit of about \$43.81.
- The average Schedule 32 Industrial Firm Sales customer that used about 214,715 therms will see a bill credit of about \$64.10.

### **Schedule 186**

This filing also revises Schedule 186 to add the per-therm credits that will be applied to customer bills for the refund of the Oregon share of revenues received from the Company's core pipeline capacity optimization activities. The refund of \$37,494,287 (before revenue sensitive effects) is comprised of \$37,433,027 from revenues for November 2020 through October 2021 activity, plus \$61,260 that is the residual remaining balance from the February 2021 credits.

The Schedule 186 credits applies across all sales-based rate schedules and is a credit of \$0.01906 per therm. The average January through March 2022 bill credit under Schedule 186 is as follows:

- Schedule 2 Residential \$11.39
- Schedule 3 Commercial \$54.23
- Schedule 31 Commercial Firm \$629.16
- Schedule 32 Industrial Firm Sales \$4,092.46
- Schedule 32 Industrial Interruptible Sales \$9,452.46

### **Combined Effects**

The combined effects of the Schedule 185 and Schedule 186 amounts is a credit to customers of \$41,477,059 (before revenue sensitive effects), which is comprised of \$41,409,293 from revenues for November 1, 2020 through October 31, 2021 activity plus, \$67,767 that is the residual remaining balance from the February 2021 credits.

The average bill effects of the Schedule 185 and Schedule 186 credits combined for the January through March time period are as follows:

- The average Schedule 2 Residential customer will see a bill credit of about \$12.97.
- The average Schedule 3 Commercial customer will see a bill credit of about \$59.64.

- The average Schedule 31 Commercial Firm Sales customer will see a bill credit of about \$672.97.
- The average Schedule 32 Industrial Firm Sales customer will see a bill credit of about \$4,156.56.
- The average Schedule 32 Industrial interruptible Sales customer will see a bill credit of about \$9,452.46.

NW Natural notes the total credit of \$41.5 million is the largest credit the Company has provided through Schedules 185 and 186. The previous historical high credit was \$16.9 million.

**Conclusion**

The Company respectfully requests that the tariff sheets filed herein be approved to become effective with service on and after January 1, 2022.

Copies of this letter and the filing made herewith are available in the Company's main office in Portland, Oregon and on its website at [www.nwnatural.com](http://www.nwnatural.com).

The Company waives paper service in this proceeding.

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

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Portland, Oregon 97204  
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[eFiling@nwnatural.com](mailto:eFiling@nwnatural.com)

Sincerely,

*/s/ Kyle Walker*

Kyle Walker, CPA  
Manager, Rates and Regulatory Affairs  
Phone: (503) 610-7051  
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Attachments

**NORTHWEST NATURAL GAS COMPANY**

P.U.C. Or. 25

Twelfth Revision of Sheet 185-1  
 Cancels Eleventh Revision of Sheet 185-1

**SCHEDULE 185  
 SPECIAL ANNUAL INTERSTATE AND INTRASTATE  
 STORAGE AND TRANSPORTATION CREDIT**

**PURPOSE:**

To credit customers served under the below-listed Rate Schedules for the Oregon share of revenues received by NW Natural for (a) interstate storage and related transportation service provided under a Limited-Jurisdiction Blanket Certificate from FERC granted under FERC Regulations, 18 C.F.R. § 284.224 (hereafter referred to as § 284.224 service), (b) core storage optimization activities; and (c) intrastate storage activities under **Rate Schedule 80** and **Rate Schedule 91**.

**APPLICABLE:**

The credit under this Schedule shall apply to customer bills issued during the February billing cycle of each calendar year, or such other time period as the Commission may approve. The credit shall apply to the following Sales Service Rate Schedules of this Tariff: **Schedule 2; Schedule 3, and; Schedules 31 and 32 – Firm Sales** only.

**CREDIT:**      **Effective Billing Cycles: January through March 2022**

The bill credit to be applied to Customer bills during the effective billing cycle will be calculated by multiplying the following per therm credit by the customer's actual gas usage billed during the period November 1, 2020 through October 31, 2021:

(C)

(C)

Rate Schedule/Class	Block	Temporary Adjustments	Schedule	Block	Temporary Adjustmnet
2		(\$0.00264)			
03 CSF		(\$0.00190)			
03 ISF		(\$0.00145)			
31 CSF	Block 1	(\$0.00144)	31 ISF	Block 1	(\$0.00102)
	Block 2	(\$0.00132)		Block 2	(\$0.00093)
32 CSF	Block 1	(\$0.00091)	32 ISF	Block 1	(\$0.00065)
	Block 2	(\$0.00079)		Block 2	(\$0.00056)
	Block 3	(\$0.00058)		Block 3	(\$0.00042)
	Block 4	(\$0.00038)		Block 4	(\$0.00027)
	Block 5	(\$0.00023)		Block 5	(\$0.00017)
	Block 6	(\$0.00016)		Block 6	(\$0.00012)

(C)

(C)

(continue to Sheet 185-2)

Issued date November 22, 2021  
 NWN OPUC Advice No. 21-18

Effective with service on  
 and after date January 1, 2022

# NORTHWEST NATURAL GAS COMPANY

P.U.C. Or. 25

Twelfth Revision of Sheet 186-1  
Cancels Eleventh Revision of Sheet 186-1

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## SCHEDULE 186 SPECIAL ANNUAL CORE PIPELINE CAPACITY OPTIMIZATION CREDIT

### **PURPOSE:**

To credit Sales Service Customers served under the below-listed Rate Schedules for the Oregon share of revenues received by NW Natural for the optimization of core customer Pipeline and Storage capacity.

### **APPLICABLE:**

This credit shall apply to customer bills issued during the February billing cycle of each calendar year, or such other time period as the Commission may approve. The credit shall apply to the following Sales Service Rate Schedules of this Tariff:

Rate Schedule 2	Rate Schedule 31 ISF	Rate Schedule 32 ISF
Rate Schedule 3	Rate Schedule 31 CSF	Rate Schedule 32 CSI
	Rate Schedule 32 CSF	Rate Schedule 32 ISI

### **CREDIT:**      **Effective Billing Cycle: January through March 2022**

The bill credit to be applied to Customer bills during the effective billing cycle will be calculated by multiplying the following per therm credit by the customer's actual gas usage billed during the period November 1, 2020 through October 31, 2021:

(\$0.01906)

(C)

(C)

(C)

### **SPECIAL CONDITIONS:**

1. NW Natural will share with customers served under the Rate Schedules listed above, the amount of net margin revenue that is attributable to optimization of core customer Pipeline and Storage capacity on an 90/10 basis; 10% will be retained by NW Natural, and 90% will be shared with customers through the credit provided for in this Schedule. For this purpose, net margin is defined as revenues less incremental operating and maintenance (O&M) expense.
2. The annual credit shall be based on the net margin as described in paragraph 1 above, and as filed with the Commission. This credit shall be applied to customers' bills, or placed in an interest bearing deferred account, on February 1 of each year, or at a date other than February 1 for reasons and on terms as the Commission may approve.
3. If the net margin for the year is negative (a loss) then the credit will be zero.
4. As provided under "OUT-OF-CYCLE TRANSFERS" provision set forth in Rate Schedules 31 and 32 a Customer that exercises the Capacity Release Option may only be eligible to receive one-half of the above-listed credit.

### **PRIOR YEAR BALANCES:**

The Company will include any remaining balance from the prior year's credit in the calculation of the current year's credit.

### **GENERAL TERMS:**

This Schedule is governed by the terms of this Schedule, the General Rules and Regulations contained in this Tariff, any other Schedules that by their terms or by the terms of this Schedule apply to service under this Schedule, and by all rules and regulations prescribed by regulatory authorities, as amended from time to time.

Issued date November 22, 2021  
NWN OPUC Advice No. 21-18

Effective with service on and  
after date January 1, 2022

EXHIBIT A

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

NW NATURAL SUPPORTING MATERIALS  
NWN OPUC Advice No. 21-18 / ADV \_\_\_\_\_

Winter 2022 Bill Adjustments  
Schedule 185 and Schedule 186

November 22, 2021

**NW NATURAL**  
**EXHIBIT A**  
**Supporting Materials**

NWN OPUC Advice No. 21-18 / ADV \_\_\_\_\_

Winter 2022 Bill Adjustments  
Schedule 185 and Schedule 186

<b>Title</b>	<b>Page</b>
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**NW Natural**  
**Rates & Regulatory Affairs**  
**Oregon Schedule 185 and Schedule 186 Credit for November 2020 - October 2021 Storage Activity**  
**Effects on Average February Bill by Rate Schedule**

ALL VOLUMES IN THERMS

					Schedule 185	Schedule 186	Combined				
		2021	2021	2021	Proposed	Proposed	Proposed	Proposed	Proposed	Proposed	
		Therms in	Active Customer	Active	Average	Sch. 185	Sch. 185	Sch. 186	Sch. 186	Combined	
		Block	Volumes	Customers	Therms	Rates	Bill Credit	Rates	Bill Credit	Rates	
Schedule	Block	A	B	C	D	E	F = E*D	G	H = G*D	I = E + G	J = I*D
2R		N/A	367,377,581	614,720	597.6	(\$0.00264)	(\$1.58)	(\$0.01906)	(\$11.39)	(\$0.02170)	(\$12.97)
3C Firm Sales		N/A	159,202,858	55,954	2,845.2	(\$0.00190)	(\$5.41)	(\$0.01906)	(\$54.23)	(\$0.02096)	(\$59.64)
3I Firm Sales		N/A	5,028,908	335	15,011.7	(\$0.00145)	(\$21.77)	(\$0.01906)	(\$286.12)	(\$0.02051)	(\$307.89)
<b>27 Dry Out</b>											
31C Firm Sales	Block 1	2,000	11,803,656	648	33,009.5	(\$0.00144)		(\$0.01906)		(\$0.02050)	
	Block 2	all additional	9,586,521			(\$0.00132)		(\$0.01906)		(\$0.02038)	
	<b>Total</b>						<b>(\$43.81)</b>		<b>(\$629.16)</b>		<b>(\$672.97)</b>
<b>31C Firm Trans</b>											
31I Firm Sales	Block 1	2,000	4,013,850	195	63,270.6	(\$0.00102)		(\$0.01906)		(\$0.02008)	
	Block 2	all additional	8,323,922			(\$0.00093)		(\$0.01906)		(\$0.01999)	
	<b>Total</b>						<b>(\$59.02)</b>		<b>(\$1,205.94)</b>		<b>(\$1,264.96)</b>
<b>31I Firm Trans</b>											
32C Firm Sales	Block 1	10,000	32,432,928	528	80,109.2	(\$0.00091)		(\$0.01906)		(\$0.01997)	
	Block 2	20,000	8,180,818			(\$0.00079)		(\$0.01906)		(\$0.01985)	
	Block 3	20,000	1,307,909			(\$0.00058)		(\$0.01906)		(\$0.01964)	
	Block 4	100,000	375,992			(\$0.00038)		(\$0.01906)		(\$0.01944)	
	Block 5	600,000	0			(\$0.00023)		(\$0.01906)		(\$0.01929)	
	Block 6	all additional	0			(\$0.00016)		(\$0.01906)		(\$0.01922)	
	<b>Total</b>						<b>(\$47.94)</b>		<b>(\$1,526.88)</b>		<b>(\$1,574.82)</b>
32I Firm Sales	Block 1	10,000	6,238,508	66	214,714.5	(\$0.00065)		(\$0.01906)		(\$0.01971)	
	Block 2	20,000	5,579,254			(\$0.00056)		(\$0.01906)		(\$0.01962)	
	Block 3	20,000	1,897,371			(\$0.00042)		(\$0.01906)		(\$0.01948)	
	Block 4	100,000	456,023			(\$0.00027)		(\$0.01906)		(\$0.01933)	
	Block 5	600,000	0			(\$0.00017)		(\$0.01906)		(\$0.01923)	
	Block 6	all additional	0			(\$0.00012)		(\$0.01906)		(\$0.01918)	
	<b>Total</b>						<b>(\$64.10)</b>		<b>(\$4,092.46)</b>		<b>(\$4,156.56)</b>
<b>32 Firm Trans</b>											
32C Interr Sales	Block 1	10,000	4,726,151	49	495,795.7	\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 2	20,000	6,898,769			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 3	20,000	3,856,420			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 4	100,000	5,719,640			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 5	600,000	3,093,007			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 6	all additional	0			\$0.00000		(\$0.01906)		(\$0.01906)	
	<b>Total</b>						<b>\$0.00</b>		<b>(\$9,449.87)</b>		<b>(\$9,449.87)</b>
32I Interr Sales	Block 1	10,000	5,669,701	57	495,931.9	\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 2	20,000	7,279,794			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 3	20,000	3,981,376			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 4	100,000	9,214,129			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 5	600,000	2,123,121			\$0.00000		(\$0.01906)		(\$0.01906)	
	Block 6	all additional	0			\$0.00000		(\$0.01906)		(\$0.01906)	
	<b>Total</b>						<b>\$0.00</b>		<b>(\$9,452.46)</b>		<b>(\$9,452.46)</b>
<b>32 Interr Trans</b>											
33											
<b>Totals</b>			674,368,207	672,552							



**NW Natural**  
**Rates & Regulatory Affairs**  
**Oregon Schedule 185 and Schedule 186 Credit for November 2020 - October 2021 Storage Activity**  
**Calculation of Increments Allocated on the EQUAL CENT PER THERM BASIS**  
**ALL VOLUMES IN THERMS**

			Schedule 186 Credits			
			Proposed Amount:	(\$37,494,287) Temporary Increment		
			Revenue Sensitive Multiplier:	2.785% add revenue sensitive factor		
			Amount to Amortize:	(\$38,568,418) To All sales		
Schedule	Block	2021 Active Customer Volumes	A	Multiplier	Volumes	Increment
				B	C	D
2R			367,377,581	1.0	367,377,581	(\$0.01906)
3C Firm Sales			159,202,858	1.0	159,202,858	(\$0.01906)
3I Firm Sales			5,028,908	1.0	5,028,908	(\$0.01906)
27 Dry Out						
31C Firm Sales	Block 1		11,803,656	1.0	11,803,656	(\$0.01906)
	Block 2		9,586,521	1.0	9,586,521	(\$0.01906)
31C Firm Trans	Block 1					
	Block 2					
31I Firm Sales	Block 1		4,013,850	1.0	4,013,850	(\$0.01906)
	Block 2		8,323,922	1.0	8,323,922	(\$0.01906)
31I Firm Trans	Block 1					
	Block 2					
32C Firm Sales	Block 1		32,432,928	1.0	32,432,928	(\$0.01906)
	Block 2		8,180,818	1.0	8,180,818	(\$0.01906)
	Block 3		1,307,909	1.0	1,307,909	(\$0.01906)
	Block 4		375,992	1.0	375,992	(\$0.01906)
	Block 5		0	1.0	0	(\$0.01906)
	Block 6		0	1.0	0	(\$0.01906)
32I Firm Sales	Block 1		6,238,508	1.0	6,238,508	(\$0.01906)
	Block 2		5,579,254	1.0	5,579,254	(\$0.01906)
	Block 3		1,897,371	1.0	1,897,371	(\$0.01906)
	Block 4		456,023	1.0	456,023	(\$0.01906)
	Block 5		0	1.0	0	(\$0.01906)
	Block 6		0	1.0	0	(\$0.01906)
32 Firm Trans	Block 1					
	Block 2					
	Block 3					
	Block 4					
	Block 5					
	Block 6					
32C Interr Sales	Block 1		4,726,151	1.0	4,726,151	(\$0.01906)
	Block 2		6,898,769	1.0	6,898,769	(\$0.01906)
	Block 3		3,856,420	1.0	3,856,420	(\$0.01906)
	Block 4		5,719,640	1.0	5,719,640	(\$0.01906)
	Block 5		3,093,007	1.0	3,093,007	(\$0.01906)
	Block 6		0	1.0	0	(\$0.01906)
32I Interr Sales	Block 1		5,669,701	1.0	5,669,701	(\$0.01906)
	Block 2		7,279,794	1.0	7,279,794	(\$0.01906)
	Block 3		3,981,376	1.0	3,981,376	(\$0.01906)
	Block 4		9,214,129	1.0	9,214,129	(\$0.01906)
	Block 5		2,123,121	1.0	2,123,121	(\$0.01906)
	Block 6		0	1.0	0	(\$0.01906)
32 Interr Trans	Block 1					
	Block 2					
	Block 3					
	Block 4					
	Block 5					
	Block 6					
33						
<b>TOTALS</b>			<b>674,368,207</b>		<b>674,368,207</b>	<b>(\$0.01906)</b>

**NW Natural**  
**Rates & Regulatory Affairs**  
**Oregon Schedule 185 and Schedule 186 Credit for November 2020 - October 2021 Storage Activity**  
**Calculation of Increments Allocated on the EQUAL PERCENTAGE OF MARGIN BASIS**  
**ALL VOLUMES IN THERMS**

		2020-2021 PGA Rates								Schedule 185 Credits			
		2021		WACOG & Temporary		MARGIN		2021		Proposed Amount:			
		Active Customer	Billing	Demand Rates*	Increments	Rate	Volumetric	Customer	Active	(\$3,982,772) Temporary Increment			
		Volumes	Rate				Margin	Charge	Customers	Total	Revenue Sensitive Multiplier:		
									Margin		2.785% rev sensitive factor is built in		
											Amount to Amortize:		
											(\$4,096,870) All Sales 2, 3, 31, & 32 Firm Sale		
Schedule	Block	A	B	C	D	E=B-C-D	F = E * A	G	H	I = F + G*H	Multiplier	Allocation to RS	Increment
											J	K	L
2R		367,377,581	\$0.90732	\$0.35671	(\$0.02738)	\$0.57799	\$212,340,568	\$8.00	614,720	\$271,353,688	1.0	(\$2,909,273)	(\$0.00264)
3C Firm Sales		159,202,858	\$0.80219	\$0.35671	(\$0.02246)	\$0.46794	\$74,497,385	\$15.00	55,954	\$84,569,105	1.0	(\$906,693)	(\$0.00190)
3I Firm Sales		5,028,908	\$0.76992	\$0.35671	\$0.02078	\$0.39243	\$1,973,494	\$15.00	335	\$2,033,794	1.0	(\$21,805)	(\$0.00145)
27 Dry Out													
31C Firm Sales	Block 1	11,803,656	\$0.50653	\$0.23684	(\$0.00980)	\$0.27949	\$5,760,215	\$325.00	648	\$8,287,415	1.0	(\$88,852)	(\$0.00144)
	Block 2	9,586,521	\$0.48418	\$0.23684	(\$0.00939)	\$0.25673					1.0		(\$0.00132)
31C Firm Trans	Block 1												
	Block 2												
31I Firm Sales	Block 1	4,013,850	\$0.47924	\$0.23684	\$0.02238	\$0.22002	\$2,550,279	\$325.00	195	\$3,310,779	1.0	(\$35,496)	(\$0.00102)
	Block 2	8,323,922	\$0.45984	\$0.23684	\$0.02272	\$0.20028					1.0		(\$0.00093)
31I Firm Trans	Block 1												
	Block 2												
32C Firm Sales	Block 1	32,432,928	\$0.40807	\$0.23684	\$0.02238	\$0.14885	\$6,028,491	\$675.00	528	\$10,305,291	1.0	(\$110,486)	(\$0.00091)
	Block 2	8,180,818	\$0.38844	\$0.23684	\$0.02289	\$0.12871					1.0		(\$0.00079)
	Block 3	1,307,909	\$0.35581	\$0.23684	\$0.02372	\$0.09525					1.0		(\$0.00058)
	Block 4	375,992	\$0.32309	\$0.23684	\$0.02457	\$0.06168					1.0		(\$0.00038)
	Block 5	0	\$0.29959	\$0.23684	\$0.02519	\$0.03756					1.0		(\$0.00023)
	Block 6	0	\$0.28810	\$0.23684	\$0.02514	\$0.02612					1.0		(\$0.00016)
32I Firm Sales	Block 1	6,238,508	\$0.39859	\$0.23684	\$0.02328	\$0.13847	\$1,728,556	\$675.00	66	\$2,263,156	1.0	(\$24,264)	(\$0.00065)
	Block 2	5,579,254	\$0.38045	\$0.23684	\$0.02366	\$0.11995					1.0		(\$0.00056)
	Block 3	1,897,371	\$0.35013	\$0.23684	\$0.02427	\$0.08902					1.0		(\$0.00042)
	Block 4	456,023	\$0.31990	\$0.23684	\$0.02488	\$0.05818					1.0		(\$0.00027)
	Block 5	0	\$0.29882	\$0.23684	\$0.02532	\$0.03666					1.0		(\$0.00017)
	Block 6	0	\$0.28793	\$0.23684	\$0.02526	\$0.02583					1.0		(\$0.00012)
32 Firm Trans	Block 1												
	Block 2												
	Block 3												
	Block 4												
	Block 5												
	Block 6												
32C Interr Sales	Block 1												
	Block 2												
	Block 3												
	Block 4												
	Block 5												
	Block 6												
32I Interr Sales	Block 1												
	Block 2												
	Block 3												
	Block 4												
	Block 5												
	Block 6												
32 Interr Trans	Block 1												
	Block 2												
	Block 3												
	Block 4												
	Block 5												
	Block 6												
33													

57 TOTALS 621,806,099 \$304,878,988 \$672,446 \$382,123,228 \$382,123,228 (\$4,096,869)  
 58 CHECK ALLOCATIONS!

59 Note: Allocation to rate schedules or blocks with zero volumes is calculated on an overall margin percentage change basis.  
 60 \* Since Billing Rates for all schedules above 31 do not include demand, column c for those schedules is WACOG only

**NW Natural**  
**Rates & Regulatory Affairs**  
**Oregon Schedule 185 and Schedule 186 Credit for November 2020 - October 2021 Storage Activity**

Source: [Margin\\_Sharing\\_OR\\_Sch 185\\_and\\_186\\_2021.xlsx](#)

	<b>TOTAL</b>	<b>Schedule 185</b>	<b>Schedule 186</b>
Interstate Storage Services & Optimization 2020-21	(\$41,409,292.54)	(\$3,976,265.00)	(\$37,433,027.54)
Remaining balance from 2020 credit provided in 2021	(\$67,766.95)	(\$6,507.00)	(\$61,259.95)
<b>Total for 2021 filing</b>	(\$41,477,059.49)	(\$3,982,772.00)	(\$37,494,287.49)