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October 17, 2022

**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: Consolidated UG 435 / UG 411 / Application of NW Natural for a General Rate Revision/Schedule 198 Renewable Natural Gas Recovery Mechanism Response to Bench Request**

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company"), hereby provides a response to Administrative Law Judge Spruce's October 12, 2022, Bench Request.

Correspondence relating to this filing should be directed to:

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NW Natural  
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Sincerely,

NW NATURAL

*/s/ Zachary Kravitz*

Zachary Kravitz  
Vice President, Rates & Regulatory Affairs

Enclosure



**Rates & Regulatory Affairs  
UG 435/UG 411  
Request for a General Rate Revision**

**Bench Request No.7:**

Please calculate five times margin based on the revised revenue requirement and costs taking into account the stipulations and other updates, as well as an assumed additional disallowance of \$356,106 of expense associated with the costs of the Community and Government Affairs Department. The company shall use a use per customer number of 531 therms, and other assumptions as referred to in NW Natural's closing brief at p. 32, except for the adjustment to reflect an assumed disallowance of \$356,106. In the brief, this number was calculated at \$2,309.

**NWN Response:**

<b>A. Customer Charge (Annual)</b>	<b>B. Volumetric Base Rate [1]</b>	<b>C. Use Per Customer</b>	<b>D. Annual Margin (A + (BxC))</b>	<b>Five Times Margin (Dx5)</b>
\$ 96.00	\$ 0.68510	531	\$ 459.79	\$ 2,298.94

[1] The updated volumetric base rate includes:

\$356,106 reduction to expense per the Bench Request;

\$0.949 million reduction in revenue requirement for projects not in-service by October 31, 2022 consistent with the October 5th Attestation;  
and

\$1.054 million reduction to depreciation expense per Order No. 22-322 in Docket UM 2214 consistent with the First Multi-Party Stipulation in UG 435.