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January 12, 2022

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, Oregon 97301-3398

**Re: UG 435 – NW Natural’s Request for a General Rate Revision  
Response to Bench Request**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), hereby provides a response to Administrative Law Judge Lackey’s December 27, 2021, Bench Request. Subject to General Protective Order No. 21-461, some of the information in the response contains confidential information.

Correspondence relating to this filing should be directed to:

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Sincerely,

NW NATURAL

*/s/ Zachary Kravitz*

Zachary Kravitz  
Senior Director, Rates & Regulatory Affairs

Enclosures

Question 1  
Question 2  
Question 3

Question 1		1(a)	1(a)(b)	1(c)	1(c)	1(d)	2	2	2	2	2	3
Docket No.	Deferral	Initial date of request	Most recent renewal request	Order Date	Order Number	Anticipated Renewal Request	12/31/2021 Deferral Balance[3]	Anticipation of when total deferred costs known	Anticipation of requested amortization	Amortize in UG-435?	Why/Why not amortize in UG 435?	For authorized deferrals currently being amortized, where are they being amortized?
UM 1027	Decoupling		9/30/2021	Pending		Pending		Sep-22 (annual/ongoing deferral)	2022-23 PGA	No	Standard PGA process deferral	PGA
UM 1078	Environmental pre-prudence SRM - post prudence [1]		1/22/2021	2/12/2021	21-047	Jan-22		Jan-22 (annual/ongoing deferral)		No	Standard PGA process deferral	PGA
UM 1101	Intervenor Funding		6/14/2021	8/12/2021	21-256	Jun-22		Sep-22 (annual/ongoing deferral)	2022-23 PGA	No	Standard PGA process deferral	PGA
UM 1420	Industrial DSM		2/26/2021	4/22/2021	21-116	Feb-22		Jan-22 (annual/ongoing deferra )	2022-23 PGA	No	Standard PGA process deferral	PGA
UM 1496	PGA (WACOG and Demand)		9/30/2021	Pending		Pending		Sep-22 (annual/ongoing deferral)	2022-23 PGA	No	Standard PGA process deferral	PGA
UM 1714	SB 844		1/11/2022	Pending		Pending		No current 844 program proposed.	2022-23 PGA	No	No costs have been incurred to date.	N/A
UM 1766	OPUC Regulatory Fee		3/22/2021	4/22/2021	21-117	Mar-22		Sep-22 (annual/ongoing deferral)	2022-23 PGA	No	Standard PGA process deferral	PGA
UM 1798	WARM		9/22/2021	10/25/2021	21-345	Sep-22		Sep-22 (annual/ongoing deferral)	2022-23 PGA	No	Standard PGA process deferral	PGA
UM 2068	COVID-19		3/23/2021	Pending		Pending		Jan-23	Nov-23	No	Anticipate amortizing after late fees resume Nov 1, 2022.	N/A
UM 2123	Curtaiment and Entitlement		10/14/2021	12/2/2021	21-454	Oct-22		Sep-22 (annual/ongoing deferral)	2022-23 PGA	No	Standard PGA process deferral	PGA
UM2132	Horizon		11/24/2021	Pending		Pending		Aug-22	UG 435	Yes	This aligns with timing of the cost recovery for the Horizon program.	N/A
UM 2139	Williams Pipeline	12/21/2020		Pending		Pending		Jan-22	UG 435	Yes	Appropriate venue to discuss emergency situation where costs were incurred.	N/A
UM 2145	Tyson (Lexington)[2]		12/21/2021	Pending		Pending		Apr-22	UG 435	Yes	This aligns with timing of the cost recovery of the Lexington RNG project.	N/A
UM 2155	GeoTEE	2/5/2021		4/22/2021	21-121	N/A		Jan-22	2022-23 PGA	No	Anticipate a separate process to discuss capitalization of non-pipeline solutions.	N/A
UM 2192	TSA Security Directive 2	9/2/2021		Pending		Pending		Aug-22	UG 435	Yes[4]	This aligns with timing of the cost recovery fro the TSA Security Directive 2.	N/A

[1] NW Natural amortizes 1/5 of the post prudence balance each year

[2] No order issued on initial deferral

[3]This does not include amounts currently in amortization accounts

[4] NW Natural has requested to recover most of the deferred costs in this rate case but there were certain costs that were unknown at the time of filing which the Company proposed to amortize with the 2022-2023 PGA.



**CERTIFICATE OF SERVICE  
UG 435**

I hereby certify that on January 12, 2022, I have served by electronic mail the confidential, unredacted copy of NW Natural's Response to Bench Request upon all parties of record for docket UG 435 who have signed General Protective Order No. 21-461.

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DATED January 12, 2022, Troutdale, OR.

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