

October 24, 2022

VIA ELECTRONIC FILING AND FEDEX MAIL

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

Re: Consolidated UG 435 / UG 411 / Application of NW Natural for a General Rate Revision/Schedule 198 Renewable Natural Gas Recovery Mechanism Attestation Filed Pursuant to Stipulation.

To PUC Filing Center:

On May 31, 2022, Northwest Natural Gas Company d/b/a NW Natural (“NW Natural” or the “Company”), Staff of the Public Utility Commission of Oregon, the Oregon Citizens’ Utility Board, the Alliance of Western Energy Consumers, and the Small Business Utility Advocates (collectively, the “Stipulating Parties”) filed a Multi-Party Stipulation Regarding Revenue Requirement, Rate Spread and Certain Other Issues (the “Stipulation”). Under the terms of Paragraph 3 of the Stipulation, NW Natural agreed to file an attestation of a Company officer (“Officer Attestation”) by October 24, 2022, identifying which of the projects listed in Appendix C to the Stipulation (1) are complete and in-service, (2) are not complete and in-service as of October 24, 2022, but which the Company anticipates will be complete and in-service by October 31, 2022, or (3) the Company anticipates will not be complete and in-service by October 31, 2022.

In compliance with the Stipulation, NW Natural files the attestation of Zachary D. Kravitz, Vice President, Rates & Regulatory Affairs. Attachment 1 to Mr. Kravitz’s attestation is an updated version of Appendix C to the Stipulation. Attachment 1 identifies which of the projects listed therein (1) are complete and in-service, (2) are not complete and in-service as of October 24, 2022, but which the Company anticipates will be complete and in-service by October 31, 2022, or (3) the Company anticipates will not be complete and in-service by October 31, 2022. For the projects listed in the attached updated version of Appendix C to the Stipulation that are complete and in-service or that are anticipated to be complete and in-service by October 31, 2022, the Company has identified the Actual In-Service Date and Actual Completed Cost of each such project. The cost of the identified projects that the Company anticipates will not be completed and placed in-service by October 31, 2022, will be completely removed from rate base for purposes of calculating the rates pursuant to the Stipulation, and rates adjusted accordingly.

Mr. Kravitz's attestation also addresses Paragraphs 4, 6 and 7 of the Stipulation regarding depreciation expense, the Horizon 1 Start-Up Cost Deferral and the TSA Security Directive Deferral, respectively.

Please note that NW Natural is filing a non-confidential version and a highly confidential version, which contains information that represents business-sensitive, non-public information and will be provided subject to Modified Protective Order No. 21-465.

Please do not hesitate to call if you have any questions about this matter.

Respectfully submitted,

/s/ Eric W. Nelsen

Eric W. Nelsen
Senior Regulatory Attorney (OSB #192566)
Northwest Natural Gas Company

NW Natural
UG 435 - Appendix C

Project Name	Dollars in Millions			
	Expected In-Service Date	Forecasted Cost in GRC	Actual In-Service Date	Actual Completed Cost
Horizon 1	Jul-22	\$ 63.7	Sep-22	\$ 65.6
Kuebler Blvd Reinforcement	Oct-22	\$ 21.3	Oct-22	\$ 18.2
Lincoln City Resource Center [1][2]	Nov-22	\$ 14.2	Oct-22	\$ 16.9
Astoria/Warrenton Resource Center	May-22	\$ 11.7	Nov-21	\$ 12.7
Central Resource Center (Phase 1)	Oct-22	\$ 10.1	Feb-22	\$ 12.6
M365 Implementation Program (Cloud Based)	Oct-22	\$ 6.6	Oct-22	\$ 7.6
NLNG Pretreatment Regeneration Improvements	Oct-22	\$ 5.1	Jul-22	\$ 5.8
Mist 300-400 Upgrade	May-22	\$ 3.5	Dec-21	\$ 4.2
IT&S Enterprise Foundations - System Integration Platform Implementation [3]	Oct-22	\$ 3.5	Oct-22	\$ 10.6
P31 - McMinnville [1]	Dec-22	\$ 3.4	Oct-22	\$ 3.5
Mist Well Rework 2022	Oct-22	\$ 3.3	Sep-22	\$ 3.6
Mist Well Rework 2021 [4]	Oct-22	\$ 3.1	Sep-21	\$ 2.0
IT&S Enterprise Foundations - Data Reporting & Analytics [3]	Oct-22	\$ 2.9	Oct-22	\$ 10.6
Tech Refresh - Voice Radio	May-22	\$ 2.9	Oct-22	\$ 3.4
EO4 - 6 and 8 inch ILI Conversion [5]	Oct-22	\$ 2.8		
Mist Corrosion Abatement 4	Jul-22	\$ 2.7	Jul-22	\$ 3.0
Tualatin Sherwood Rd. Grading	Oct-22	\$ 2.6	Oct-22	\$ 7.0
E15 - S. Eugene Trans	Jun-22	\$ 2.2	Apr-22	\$ 3.1
Calvin Creek Electric Conductor Replacement	Jun-22	\$ 2.0	Apr-22	\$ 2.5
Tech Refresh - Telemetry [2][6]	Oct-22	\$ 1.2	Oct-22	\$ 0.6
NLNG T-1 Foundation Heating	Oct-22	\$ 1.7	Sep-22	\$ 2.4
Mist Electrical Systems Updates	Oct-22	\$ 1.7	Oct-22	\$ 2.9
Natural Forces Projects [5]	Oct-22	\$ 1.4		
E08 Springfield Trans 8 in. ILI	Oct-22	\$ 1.4	Oct-22	\$ 2.2
Newport Switchgear Replacement [5]	Oct-22	\$ 1.3		
Physical Security Enhancements Program [5]	Oct-22	\$ 1.1		
PLNG Boil Off Compressor [5]	Oct-22	\$ 1.1		
300-400 Cooler Replacement	Jul-22	\$ 0.8	Sep-22	\$ 2.3
317th and Jackson Measurement [2]	Oct-22	\$ 0.8	Oct-22	\$ 0.1
202437 Mist GC 600 Compressor Rebuild	Aug-22	\$ 0.7	Sep-22	\$ 0.6
300-400 Header Valve Automation	Aug-22	\$ 0.6	Jun-22	\$ 0.7
TBD1845 Fire System Upgrade [5]	Sep-22	\$ 0.6		
202438 Mist GC500 Compressor Rebuild	Jun-22	\$ 0.6	Aug-22	\$ 0.8
Miller Station TI [5]	Oct-22	\$ 0.5		
TBD52418 PLNG Glycol Heat Exchanger	Sep-22	\$ 0.5	Oct-22	\$ 0.1
202286 Miller Station Level Controller Upgrade	Mar-22	\$ 0.5	Aug-22	\$ 0.6
300-400 Heavy Piston Upgrade	Sep-22	\$ 0.4	Jul-22	\$ 0.5
300-400 Suction and Recycle Control Valve	Sep-22	\$ 0.4	Jun-22	\$ 0.8
GC500&GC600 Separator Dump Valve Upgrade	Oct-22	\$ 0.4	Sep-22	\$ 0.2
TBD1843 300-400 Hot Start Rebuild	Sep-22	\$ 0.3	Oct-22	\$ 0.3
202440 Als and Reichfold Becker valves	Dec-22	\$ 0.2	Aug-22	\$ 0.3
202407 Delta & Green Acres Dist Reg	May-22	\$ 0.2	Oct-22	\$ 0.2
202370 Mist GC 500 HMI and Controls Upgrade [5]	Jul-22	\$ 0.2		

[1] The Expected In-Service Date of this project should have read Oct-22.

[2] The Company anticipates that this project will be complete and in-service by October 31, 2022.

[3] These two sub-projects, or work streams, were part of a larger project, "IT&S Enterprise Foundations". The actual completed cost is the combined project cost with an estimate of \$6.4M and an actual of \$10.6M.

[4] The Expected In-Service Date of this project should have read Dec-21.

[5] The Company does not anticipate that this project will be complete and in-service by October 31, 2022.

[6] The Forecasted Cost in GRC should have read \$1.2M rather than \$1.7M.



CERTIFICATE OF SERVICE
UG 435 / UG 411

I hereby certify that on October 24, 2022, I have served the unredacted, confidential and highly confidential versions of NW NATURAL'S ATTESTATION FILED PURSUANT TO STIPULATION upon parties of record in docket UG 435 by electronic or FedEx mail.

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DATED October 24, 2022, Troutdale, Oregon.

/s/ Erica Lee-Pella
Erica Lee-Pella
Rates & Regulatory Affairs
NW Natural