BEFORE THE
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
UG
GENERAL RATE APPLICATION
OF
NORTHWEST NATURAL GAS COMPANY
December 21, 2019
December 31, 2018
Direct Exhibit of Kevin S. McVay
REVENUE REQUIREMENT
Exh. KSM-4

NW Natural Washington Rate Case Test Year Based on Twelve Months Ended September 30, 2018

		Washington Allocated Results					
					Proposed	Test Year at	
Line		Test Year		Test Year	Rate	10.30%	
No.		Results	Adjustments	Adjusted	Increase	Equity Return	
		(a)	(b)	(c)	(d)	(e)	
	Operating Revenues						
1	Sale of Gas	\$67,314,413	(\$3,593,725)	\$63,720,688	\$8,312,044	\$72,032,732	
2	Transportation	2,370,981	(9,877)	2,361,104	0	2,361,104	
3	Miscellaneous Revenues	(2,048,364)	2,287,568	239,204	0	239,204	
4	Total Operating Revenues	67,637,030	(1,316,034)	66,320,996	8,312,044	74,633,040	
	Operating Revenue Deductions						
5	Gas Purchased	25,772,083	(1,327,405)	24,444,678	0	24,444,678	
6	Uncollectible Accrual for Gas Sales	58,166	17,476	75,642	8,774	84,416	
7	Other Operating & Maintenance Expenses	17,639,305	419,002	18,058,307	0	18,058,307	
8	Total Operating & Maintenance Expense	43,469,553	(890,926)	42,578,627	8,774	42,587,401	
9	Federal Income Tax	1,360,922	(286,902)	1,074,020	1,672,958	2,746,978	
10	Property Taxes	1,268,490	228,144	1,496,634	0	1,496,634	
11	Other Taxes	3,687,322	(12,115)	3,675,207	336,804	4,012,011	
12	Depreciation & Amortization	9,434,311	129,240	9,563,551	0	9,563,551	
13	Total Operating Revenue Deductions	59,220,599	(832,559)	58,388,040	2,018,536	60,406,575	
14	Net Operating Revenues	\$8,416,431	(\$483,475)	\$7,932,956	\$6,293,509	\$14,226,465	
15	Total Rate Base	\$162,928,776	\$23,550,167	\$186,478,943	\$0	\$186,478,943	
16	Rate of Return	5.17%	=	4.25%		7.63%	
17	Return on Common Equity	5.33%	=	3.48%		10.30%	

Total

NW Natural Adjustments to Test Period Test Year Based on Twelve Months Ended September 30, 2018

		Restating	Restating	Restating	Restating	Restating	Restating	Restating	Restating	Restating	Restating	Restating	Pro Forma
Line No.		Weather Normalized Gas Sales & Purchases (a)	Misc Revenues Adjustment (b)	Bonus Adjustment (c)	Property Tax Adjustment (d)	Uncollectible Accounts Adjustment (e)	Working Capital Adjustment (f)	Marketing and Cust. Comm. Adjustment (g)	Claims Adjustment (h)	Rate Case Adjustment (i)	Clearing Adjustment (j)	Total Restating Adjustments (k)	Payroll Adjustment (I)
1 2 3	Operating Revenues Sale of Gas Transportation Miscellaneous Revenues	(3,593,725) (9,877)	2,287,568									(3,593,725) (9,877) 2,287,568	
4	Total Operating Revenues	(3,603,602)	2,287,568	0	0	0	0	0	0	0	0	(1,316,034)	0
5 6 7	Operating Revenue Deductions Gas Purchased Uncollectible Accrual Other Operating & Maintenance Expenses	(1,327,405) (3,804)		(160,538)		21,280		(287,523)	35,323	137,833	16,363	(1,327,405) 17,476 (258,543)	538,699
8	Total Operating & Maintenance Expense	(1,331,208)	0	(160,538)	0	21,280	0	(287,523)	35,323	137,833	16,363	(1,568,471)	538,699
9 10 11 12	Federal Income Tax Property Taxes Other Taxes Depreciation & Amortization	(446,539) (146,018)	460,924 92,692	34,540	(47,910) 228,144	(4,469)	(67,568)	60,380	(7,402)	(28,945)	(4,777)	(51,766) 228,144 (53,326) 0	(113,127)
13	Total Operating Revenue Deductions	(1,923,765)	553,616	(125,998)	180,234	16,811	(67,568)	(227,143)	27,921	108,888	11,586	(1,445,419)	425,572
14	Net Operating Revenues	(1,679,837)	1,733,952	125,998	(180,234)	(16,811)	67,568	227,143	(27,921)	(108,888)	(11,586)	129,385	(425,572)
15 16	Average Rate Base Utility Plant in Service Accumulated Depreciation			(155,750)			12,717,540		(2,895)		252,298	12,811,193 0	
17	Net Utility Plant	0	0	(155,750)	0	0	12,717,540	0	(2,895)	0	252,298	12,811,193	0
18 19 20 21	Storage Gas Aid in Advance of Construction Leasehold Improvements Accumulated Deferred Income Taxes											0 0 0	
22	Total Rate Base	0	0	(155,750)	0	0	12,717,540	0	(2,895)	0	252,298	12,811,193	0
23	Interest Coordination	0	0	(3,940)	0	0	321,754	0	(73)	0	6,383	324,123	0

NW Natural Adjustments to Test Period Test Year Based on Twelve Months Ended September 30 Page 2

Total

		Pro Forma	Pro Forma	Pro Forma	Pro Forma	Pro Forma	Pro Forma	Pro Forma	
Line No.		Payroll Overhead Adjustment (m)	Depreciation Adjustment (n)	Post Test Year Capital Adjustment (o)	EDIT Amortization Adjustment (p)	Holdco Adjustment (q)	Director Adjustment (r)	Total Pro Forma Adjustments (s)	Total Adjustments (t)
1 2 3	Operating Revenues Sale of Gas Transportation Miscellaneous Revenues							0 0 0	(3,593,725) (9,877) 2,287,568
4	Total Operating Revenues	0	0	0	0	0	0	0	(1,316,034)
5 6 7	Operating Revenue Deductions Gas Purchased Uncollectible Accrual Other Operating & Maintenance Expenses	157,153				(37,467)	19,160	0 0 677,545	(1,327,405) 17,476 419,002
8	Total Operating & Maintenance Expense	157,153	0	0	0	(37,467)	19,160	677,545	(890,926)
9 10 11 12	Federal Income Tax Property Taxes Other Taxes Depreciation & Amortization	(41,656) 41,210	35,583 (169,444)	(116,861) 298,684	(2,919)	7,868	(4,024)	(235,136) 0 41,210 129,240	(286,902) 228,144 (12,115) 129,240
13	Total Operating Revenue Deductions	156,708	(133,861)	181,823	(2,919)	(29,599)	15,136	612,860	(832,559)
14	Net Operating Revenues	(156,708)	133,861	(181,823)	2,919	29,599	(15,136)	(612,860)	(483,475)
15 16	Average Rate Base Utility Plant in Service Accumulated Depreciation			10,189,608	0			10,189,608 0	23,000,801
17	Net Utility Plant	0	0	10,189,608	0	0	0	10,189,608	23,000,801
18 19 20 21	Storage Gas Aid in Advance of Construction Leasehold Improvements Accumulated Deferred Income Taxes				549,366			0 0 0 549,366	0 0 0 549,366
22	Total Rate Base	0	0	10,189,608	549,366	0	0	10,738,974	23,550,167
23	Interest Coordination	0	0	257,797	13,899	0	0	271,696	317,741

Northwest Natural Gas Company Adjustments to Test Period Test Year Based on Twelve Months Ended September 30, 2018 (\$000)

Line No.	Income Tax Calculations	Weather Normalized Gas Sales & Purchases (a)	Misc Revenues Adjustment (b)	Bonus Adjustment (c)	Property Tax Adjustment (d)	Uncollectible Accounts Adjustment (e)	Working Capital Adjustment (f)	Marketing and Cust. Comm. Adjustment (g)	Claims Adjustment (h)	Rate Case Adjustment (i)	Clearing Adjustment (j)	Total Restating Adjustments (k)	Payroll Adjustment (I)
1	Book Revenues	(3,603,602)	2,287,568	0	0	0	0	0	0	0	0		0
2	Book Expenses before Deprec. & Interest	(1,477,226)	92,692	(160,538)	228,144	21,280	0	(287,523)	35,323	137,833	16,363		538,699
3	State Tax Depreciation	0	0	0	0	0	0	0	0	0	0		0
4	Interest Expense (Income)	0	0	(3,940)	0	0	321,754	0	(73)	0	6,383		0
5	Book/Tax Differences (Sched. M)	0	0	0	0	0	0	0	0	0	0		0
6	Federal Taxable Income	(2,126,376)	2,194,876	164,478	(228,144)	(21,280)	(321,754)	287,523	(35,250)	(137,833)	(22,746)		(538,699)
7	Federal Income Tax [1]	(446,539)	460,924	34,540	(47,910)	(4,469)	(67,568)	60,380	(7,402)	(28,945)	(4,777)		(113,127)
8	ITC	0	0	0	0	0	0	0	0	0	0		0
9	Current Federal Tax	(446,539)	460,924	34,540	(47,910)	(4,469)	(67,568)	60,380	(7,402)	(28,945)	(4,777)		(113,127)
10	Deferred Income Tax - Federal	0	0	0	0	0	0	0	0	0	0		0
11	Deferred Income Tax - State	0	0	0	0	0	0	0	0	0	0		0
12	ITC Restored (Deferred)	0	0	0	0	0	0	0	0	0	0		0
13	Total Federal Tax	(446,539)	460,924	34,540	(47,910)	(4,469)	(67,568)	60,380	(7,402)	(28,945)	(4,777)		(113,127)

Northwest Natural Gas Company Adjustments to Test Period Test Year Based on Twelve Months Ended September 30, 20 (\$000)

Line No.	Income Tax Calculations	Payroll Overhead Adjustment	Depreciation Adjustment	Post Test Year Capital Adjustment	EDIT Amortization Adjustment	Washington Hedging Adjustment	Washington Hedging Adjustment	Total Pro Forma Adjustments	Total Adjustments
		(m)	(n)	(o)	(p)	(q)	(r)	(s)	(t)
1	Book Revenues	0	0	0	0	0	0		
2	Book Expenses before Deprec. & Interest	198,364	0	0	0	(37,467)	19,160		
3	State Tax Depreciation	0	(169,444)	298,684	0	0	0		
4	Interest Expense (Income)	0	0	257,797	13,899	0	0		
5	Book/Tax Differences (Sched. M)	0	0	0	0	0	0		
6	Federal Taxable Income	(198,364)	169,444	(556,481)	(13,899)	37,467	(19,160)		
7	Federal Income Tax [1]	(41,656)	35,583	(116,861)	(2,919)	7,868	(4,024)		
8	ιτс	0	0	0	0	0	0		
9	Current Federal Tax	(41,656)	35,583	(116,861)	(2,919)	7,868	(4,024)		
10	Deferred Income Tax - Federal	0	0	0	0	0	0		
11	Deferred Income Tax - State	0	0	0	0	0	0		
12	ITC Restored (Deferred)	0	0	0	0	0	0		
13	Total Federal Tax	(41,656)	35,583	(116,861)	(2,919)	7,868	(4,024)		

NW Natural Test Year Based on Twelve Months Ended September 30, 2018 Weather Normalized Gas Sales and Purchases Adjustment

			Actual		Normalized			
		Therm	Average Class	Revenues	Therm	Average Class	Revenues	
Reve	nues	Deliveries	Price Per Therm	and Margin	Deliveries	Price Per Therm	and Margin	Adjustment
		(a)	(b)	(c)	(d)	(e)	(f)	(g)
	Sales Volumes and Revenues							
1	Residential	50,068,986	0.93166	\$46,647,052	50,368,669	0.87489	\$44,067,223	
2	Commercial	21,738,480	0.83207	\$18,087,986	21,869,677	0.78588	\$17,187,046	
3	Industrial Firm	3,052,386	0.64441	\$1,966,975	3,064,902	0.62388	\$1,912,138	
4	Interruptible	1,319,198	0.41212	\$543,668	1,319,198	0.42016	\$554,280	
5	Total Sales of Gas Revenues	76,179,050		\$67,245,682	76,622,447		\$63,720,688	(\$3,524,994)
6	Unbilled amounts	117,158		\$68,731				(\$68,731)
7	Unaccounted For Gas	228,702						
	Transportation Volumes and Revenues							
8	Firm	7,065,720	0.16811	\$1,187,790	7,065,720	0.16734	\$1,182,353	
9	Interruptible	10,909,907	0.08649	\$943,569	10,908,382	0.08609	\$939,123	
10	Special Contracts - Firm	2,813,155	0.08518	\$239,621	2,813,155	0.08518	\$239,628	
11	Total Transportation	20,788,782	-	\$2,370,981	20,787,257	-	\$2,361,104	(\$9,877)
12	Total Deliveries and Revenues	97,313,692	=	\$69,685,394	97,409,704	=	\$66,081,791	(\$3,603,602)
Gas C	osts							
13	Demand Charges (Net of Deferral)			\$8,770,697			\$8,063,564	
14	Commodity Charges (Net of Deferral)			19,856,051			16,381,114	
15	Commodity and Demand Amortizations		-	(2,854,665)		-	0	
16	Total Cost of Gas		=	\$25,772,083		=	\$24,444,678	(\$1,327,405)
17	Total Margin		=	\$43,913,311		=	\$41,637,113	

NW Natural
Washington Rate Case
Test Year Based on Twelve Months Ended September 30, 2018
Adjustments to Miscellaneous Revenues

Worksheet b

Line				
No.	_	Actual	Normalized	Adjustment
		(a)	(b)	(c)
	Revenue & Technical Adjustments			
1	DSM - Amortization	(\$2,032,720)	\$0	\$2,032,720
2	WA GREAT, WA-LIEE	(\$304,443)	\$0	\$304,443
3	Subtotal	(\$2,337,162)	\$0	\$2,337,162
3	Subtotal	(72,337,102)	γU	72,337,102
Other I	Miscellaneous Revenues			
4	FORFEITED DISCOUNTS-LATE PAYMENT CHARGE	\$89,244	\$90,177	\$933
5	MISC SERVICE REVENUES-AUTOMATED PAYMENT	\$5,723	\$5,951	\$228
6	MISC SERVICE REVENUES-DELINQ RECONN FEE	\$1,500	\$1,500	\$0
7	MISC SERVICE REVENUES-FIELD COLLECTION C	\$33,220	\$33,220	\$0
8	MISC SERVICE REVENUES-GAS DIVERSIONS	\$1,383	\$1,383	\$0
9	MISC SERVICE REVENUES-RECONN CHG-CR-AFTE	\$34,700	\$34,433	(\$267)
10	MISC SERVICE REVENUES-RECONN CHG-CR-DURI	\$15,900	\$15,900	\$0
11	MISC SERVICE REVENUES-RECONN CHG-SEAS-AF	\$1,200	\$1,717	\$517
12	MISC SERVICE REVENUES-RECONN CHG-SEAS-DU	\$550	\$550	\$0
13	MISC SERVICE REVENUES-RETURNED CHECK CHA	\$11,658	\$11,658	\$0
14	MISC SERVICE REVENUES-SEAS RECONN FEE	\$300	\$300	\$0
15	MISC SERVICE REVENUES-SUMMARY BILL SVCS	\$0	(\$8)	(\$8)
16	OTHER GAS REVENUES-METER RENTALS	\$18,356	\$19,365	\$1,008
17	OTHER GAS REV-LNG SALES & OTHER MISC REV	\$600	\$1,370	\$770
18	RENT FROM GAS PROPERTY-RENT - UTILITY PR	\$74,465	\$21,689	(\$52,776)
13	Subtotal	\$288,798	\$239,204	(\$49,594)
14	Total	(\$2,048,364)	\$239,204	\$2,287,568

Northwest Natural Gas Company Test Year Based on Twelve Months Ended September 30, 2018 Bonus Adjustment

Line No.	_	2015 paid in 2016	2016 paid in 2017	2017 paid in 2018	Three Year Average	Test Year Accrual	Adjustment
	-	(a)	(b)	(c)	(d)	(e)	(f)=(d)-(e)
	Officers/Exempt	_					
1	Performance Bonus - O & M	\$6,213,593	\$5,597,391	\$6,107,412	\$5,972,799	\$6,572,483	(\$599,685)
2	Performance Bonus - Construction	2,580,181	2,594,415	2,952,686	2,709,094	3,587,548	(878,454)
	Clerical/Hourly	_					
3	Key Goals Bonus - O & M	0	597,200	1,105,922	567,707	1,400,378	(832,671)
4	Key Goals Bonus - Construction	0	358,883	534,668	297,850	764,387	(466,537)
5	Total	8,793,774	9,147,889	10,700,688	9,547,450	12,324,796	(2,777,346)
6	Total Adjusted O & M (line 3 + line 9)						(\$1,432,355)
7	Washington Allocation Factor			I	Employee Cost	_	11.21%
8	Adjustment to Washington - O&M				=	(\$160,538)	
9	Total Adjusted Construction (line 6 + line 12)						(\$1,344,991)
10	Washington Allocation Factor				Gross Plant		11.58%
11	Adjustment to Washington - Rate Base				C. 000 1 Idile	- -	(\$155,750)

Adjustment takes expense from test period accrual to 3 year paid average

Worksheet d

NW Natural Test Year Based on Twelve Months Ended September 30, 2018 Property Tax Adjustment

Line No.		Expense (a)
1	Property Taxes - Test Period Expense	\$1,268,490
2	Property Taxes - Paid During 2018	1,509,613
3	Property Taxes - Capitalized	12,979
4	Adjustment	\$228,144

Worksheet e

NW Natural
Test Year Based on Twelve Months Ended September 30, 2018
Uncollectible Accounts Adjustments

12 Months Ended September Line 2016 - 2018 2018 2017 2016 No. Total **Actual Actual** Actual (a) (b) (c) (d) **Gas Revenues** 1 Residential \$1,279,892,130 \$422,699,759 \$454,168,194 \$403,024,176 2 Commercial 636,944,211 208,617,626 227,807,903 200,518,682 3 Industrial 65,643,595 21,527,710 22,807,945 21,307,940 62,809,074 20,395,258 4 Interruptible 22,239,876 20,173,941 5 727,023,918 Total 2,045,289,010 673,240,352 645,024,739 **Net Write-Offs** 6 Residential 430,995 694,701 606,517 1,732,214 7 Commercial 95,298 93,699 275,086 86,089 8 Industrial 151,544 2,307 27,123 122,114 9 Interruptible 0 0 2,158,844 817,122 822,330 10 Total 519,392 Write-Off % - 3-Year Average 11 Residential 0.135% 0.102% 0.153% 0.150% 12 Commercial 0.043% 0.041% 0.042% 0.047% 13 Industrial 0.231% 0.011% 0.119% 0.573% 14 Interruptible 0.000% 0.000% 0.000% 0.000% 15 Weighted Total [1] 0.106% 0.077% 0.112% 0.127% **Normalized Uncollectible** \$572,084 16 Residential 90,099 17 Commercial 18 Industrial 49,699 19 Interruptible 20 \$711,882 Total 21 Allocation Factor (Customers - All) 11.16% \$79,446 22 Washington Normalized Amount 23 Washington Allocation of Accrued Amount \$58,166

\$21,280

Adjustment (Normalized less Accrued)

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NW Natural Washington Rate Case Working Capital Calculation

Worksheet f

		AMA
	Average Invested Capital	776 767 226
1	Common Equity	776,767,236
2	Preferred Stock Miscellaneous Debt	- 012 722 020
3 4	Deferred ITC	813,733,020 322
5	Deferred Liabilities	_
6	Total Invested Capital	16,505,113
O	Total Invested Capital	1,007,003,090
	Average Investments	
	Utility Operating Investments	
7	Plant in Service	2,981,614,839
8	Accumulated Depreciation	(1,327,857,300)
9	Deferred Income Taxes	(362,148,977)
10	Gas Stored Underground - Cushion Gas	18,056,545
11	Property Held for Future Use	960,295
12	Customer Advances	(5,072,451)
13	Contributions in Aid of Construction	(4,207,252)
14	Investment in Gas Reserves	114,848,596
15	Total Operating Investments	1,416,194,296
	Other Investments	
16	Construction Work In Process	186,480,461
17		52,659,384
18	Non-Utility Property Accumulated Depreciation - non utility	
19		(19,054,381)
_	Deferred Income Tax - non-utility & Oregon	(130,058,467)
20	Investments in Subsidiary Companies	58,304,491
21	Temporary Cash Investments	3,298,275
22	Deferred Gas Costs	(21,270,245)
23	Other Deferred Debits	113,293,024
24	Total Other Investments	243,652,542
25	Total Average Investments (In 15 + In 24)	1,659,846,838
26	Less CWIP (In 16)	(186,480,461)
27	Less Deferred Gas Costs (In 22)	21,270,245
28	Total Base Investment - System	1,494,636,622
29	Investor Supplied Working Capital (In 6 - In 28)	\$ 112,369,069
30	Less Working Gas Inventory	34,231,890
31	Allowable Working Capital - System	\$ 78,137,179
-	, monable tronting capital cyclem	ψ ,0,13,,173
32	Working Capital Percentage Allowable (In 31 / In 28)	5.27%
33	Washington Rate Base (excludes WC - includes adjustments)	\$173,761,403
34	Allowable Investor Supplied Working Capital (In 33 X In 32)	\$ 9,150,577
35	Working Gas Inventory	\$ 34,231,890
36	Inventory allocation % - firm delivered	10.42%
37	Washington Gas Inventory (In 35 X In 36)	\$ 3,566,963
38	Total Working Capital Allowance (In 37 + In 34)	\$ 12,717,540

NW Natural Test Year Based on Twelve Months Ended September 30, 2018 Marketing and Customer Communications Adjustment

Worksheet g

Line No.		Washington Allocated Amount (a)	Disallowance Percent (b)	Disallowed Amount (c)
1	Marketing Expenses - Account 912	\$236,575	100%	(\$236,575)
	Advertising	System Expensed Amount	Allocation Factor (Residential Customers)	Disallowed Washington Allocated Amount
		(a)	(b)	(c)
2	Expenses not qualifying under 480-90-223	\$452,073	11.27% _	(\$50,949)
	Total Marketing and Advertising			
3	Total Adjustment for Marketing & Communications			(\$287,523

Worksheet h

NW Natural Test Year Based on Twelve Months Ended September 30, 2018 Claims Expense Adjustment

Line			
No.	_	O&M Expense	Construction
		(a)	(b)
1	Expensed during Test period	\$112,509	\$145,967
	Normalized Expenses		
2	Actual Claims - Ordinary (Paid)	186,612	120,967
3	3-Year Average Claims - Extraordinary 1/	240,998	0
4	Subtotal	427,610	120,967
5	Adjustment - System (line 4 - line 1)	315,101	(25,000)
6	Allocation to Washington		
	(O&M on 3-factor, const on gross plant)	11.21%	11.58%
7	Adjustment	\$35,323	(\$2,895)

1/	Extraordinary Claims	TME December
	TME 9/30/16	298,383
	TME 9/30/17	358,715
	TME 9/30/18	65,897_
	3-Year Average	240,998

NW Natural Worksheet i

Test Year Based on Twelve Months Ended September 30, 2018 Rate Case Expense Adjustment

No.	O&M Expense (a)
1 Outside Services - Washington Rate Case	\$413,500
2 3-Year Average for rate case frequency	\$137,833
Return on Equity Consultant	83,500
Cost of Service / Rate Design Consultant	130,000
Outside Legal	200,000
Total	413,500

NW Natural	Worksheet j
Test Year Based on Twelve Months Ended September 30, 2018	
Elimination of Clearing Account Balances	

Line	
No.	Amount
1 Adjustment to O&M	\$16,363
2 Adjustment to Construction	\$252.298

Northwest Natural Gas Company Test Year Based on Twelve Months Ended September 30, 2018 Payroll Adjustment - Excluding Bonuses

Line					
No.	_	Total 1/	Officers 2/	NBU	BU
		(a)	(b)	(c)	(d)
1	12 Months Payroll - 9/30/2018	103,089,048	3,681,313	51,335,877	48,071,858
2	Payroll - Annualized 3/	104,449,105	3,620,846	51,757,006	49,071,253
3	Annualized 2018 Wage Increases (5 months) NBU	791,392		791,392	
4	Annualized 2019 Wage Increases (12 months) NBU	2,101,936		2,101,936	
5	Annualized 2017 Wage Increases (2 months) BU	278,137			278,137
6	Adjust 2018 Wage Increases (12 months) BU	1,727,229			1,727,229
7	Adjust 2019 Wage Increases (12 months) BU	1,787,682			1,787,682
8	Payroll - Normalized	111,135,479	3,620,846	54,650,334	52,864,300
9	O&M Payroll Factor	63.1%	72.5%	64.7%	60.8%
10	O&M Payroll - Normalized	70,125,373	2,625,113	35,358,766	32,141,494
11	O&M Payroll - Actual	65,110,954	2,668,952	33,214,312	29,227,690
12	Adjustment to O & M Payroll - System	5,014,419	(43,839)	2,144,454	2,913,804
13	Washington Allocation for O&M Payroll	10.74%			
14	Adjustment to O & M Payroll - Washington	\$538,699			
Notes	·				
	2017 BU Salary Adjustment December 1, 2017	3.50%			
	2018 NBU Adjustment March 1, 2018	3.75%			
	2018 BU Salary Adjustment December 1, 2018	3.50%			
	2019 NBU Adjustment March 1, 2019	4.00%			
	2019 BU Salary Adjustment December 1, 2019	3.50%			
		2.3070			

^{1/} Total and Officer columns included to determine company O&M % for some adjustments

^{2/} Normalized to test year average pay per executive times ending 12 Officers

^{3/} Amounts reflect average salaries at end of period count.

Northwest Natural Gas Company
Test Year Based on Twelve Months Ended September 30, 2018
Payroll Adjustment - Excluding Bonuses
Annualized Wages and Salaries

Worksheet I (2)

Line				
No.		Officers	NBU	BU
		(a)	(b)	(c)
1	Adjusted Employee Count - Year-end 1/	12.0	508.3	630.2
2	Average Employee Count - Test Period	12.2	504.2	617.4
3	Test Year Payroll	\$3,681,313	\$51,335,877	\$48,071,858
4	Average Payroll per Employee (line 3 / line 2)	\$301,737	\$101,816	\$77,865
5	Payroll Based on Year-end Employees	\$3,620,846	\$51,757,006	\$49,071,253
	(line 4 * line 1)			

	Officers	NBU	BU
2017 October	12.0	489.5	596.4
2017 November	12.0	494.6	604.4
2017 December	11.9	499.7	612.3
2018 January	12.0	501.3	617.6
2018 February	12.0	505.5	611.8
2018 March	12.5	506.0	619.2
2018 April	12.0	507.5	620.5
2018 May	12.0	510.0	619.4
2018 June	12.0	510.2	622.2
2018 July	12.0	508.7	621.4
2018 August	13.0	509.1	633.0
2018 September	13.0	508.3	630.2
Average	12.2	504.2	617.4

^{1/} Reflects expected retirement of HR executive

NW Natural Test Year Based on Twelve Months Ended September 30, 2018 Payroll Overhead Adjustment

Worksheet m

Line		System Adjustment Amount	Washington Allocation Factor 1/	Washington Adjustment Amount
No.	_	(a)	(b)	(c)
	Health and Life Insurance Adjustment	_		
1 2	Health and Life O&M Costs - Actual Test Period O&M Health and Life O&M Costs - Current Cost	11,830,300 12,199,939		
3	Total Adjustment	\$369,639	10.74%	39,710
	Pension Adjustment - Washington Allocated Costs	_		
4	Pension Costs - Test Period Actual O&M	1,844,666		
5	Pension Costs - Current Cost (Calendar 2018)	1,962,109		
6	Total Adjustment	\$117,443	100.00%	117,443
7	Total O&M Adjustment			157,153
	Note: Pension administrative costs and Western States not	normalized		
	Payroll Tax Adjustment	_		
_	Adicated Decirelly 0004	70 425 272		
8 9	Adjusted Payroll - O&M Test Period Payroll - O&M	70,125,373 65,110,954		
9	iest reliou rayioii - Odivi	05,110,954		
10	Incremental Payroll	5,014,419		
11	FICA Tax Rate	7.65%		
12	Incremental Payroll Taxes	\$383,603	10.74%	41,210

NW Natural Worksheet n Test Year Based on Twelve Months Ended September 30, 2018

Depreciation Adjustment

Line No.		Expense
	_	(a)
1	Depreciation Expense - Test Year Actual	9,434,311
2	Depreciation Expense - New Rates	9,264,867
3	Depreciation Expense Adjustment	(169,444)

Worksheet o

Line No.	-	Amount (a)
1	Addition to Rate Base	10,189,608
2	Addition to Depreciation Expense	298,684

Test Year Based on Twelve Months Ended September 30, 2018

Washington Post Test-Year Capital Projects

NW Natural

NW Natural Worksheet p

Test Year Based on Twelve Months Ended September 30, 2018 Excess Deferred Tax Amortization

Line No.		Expense
	-	(a)
1	Plant Related Excess Deferred Taxes	400,000
2	Non-Plant Related Excess Deferred Taxes	(33,756)
3	Riders external to Rate Case Revenue Requirement	366,244
4	Reduction of Deferred Taxes - Rate Base (3-Year Ave)	549,366

Test Y	atural Tear Based on Twelve Months Ended September 30, 2018 o Adjustment	Worksheet q
Line No.	-	O&M Expense (a)
1 2	Washington Allocated amounts from Departments (below) Amount Allocable to Affiliates (3.4%)	425,738 (14,475)
3 4	Washington Allocated amounts from Departments (below) Amount Allocable to Affiliates (10%)	229,915 (22,991)
5	Total Adjustment	(37,467)

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		Washington
42014	SEC REPORTING	13
42014	SEC REPORTING	303
42014	SEC REPORTING	72,806
44010	FIN PLANNING & BUDGE	113,861
46010	CORP SECRETARY	=
46010	CORP SECRETARY	(433)
46010	CORP SECRETARY	42
46010	CORP SECRETARY	19,763
46020	SHAREHOLDER SVCS	1,276
46020	SHAREHOLDER SVCS	2,466
46020	SHAREHOLDER SVCS	16,594
46020	SHAREHOLDER SVCS	23,300
46030	CORP ETHICS & COMPL	18,380
48010	INVESTOR RELATIONS	45,293
72500	INTERNAL AUDITING	105,976
73600	VP & CORPORATE SECTY	6,100
	Subject to Allocation (3.4)	425,738
40010	CODD CECDETADY	220.015
46010	CORP SECRETARY	229,915
	Subject to Allocation (10.0)	229,915
	,	223,313

NW Natural	Worksheet r
Test Year Based on Twelve Months Ended September 30, 2018	

Director Adjustment

Line No.	_	O&M Expense (a)
1	Washington Allocated Director Expense	229,915
2	Cost per Director (12 Directors)	19,160
3	Adjustment for Additional Director	19,160