

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

NORTHWEST NATURAL GAS  
COMPANY, DBA NW NATURAL,

2020 Integrated Resource Plan.

DOCKET NO. UG-190711

NW NATURAL GAS COMPANY

PETITION FOR TEMPORARY  
EXEMPTION FROM WAC 480-90-  
238(4), INTEGRATED RESOURCE  
PLANNING

**I. INTRODUCTION**

1 Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), respectfully requests that the Commission allow it to change the filing date of its upcoming Integrated Resource Plan (“IRP”) from August 21, 2020 to February 26, 2021. Under WAC 480-90-238(4), NW Natural is required to submit an IRP within two years of the date of its previous filing (in this case, by August 21, 2020). However, WAC 480-90-008 provides that the Commission may grant an exemption from any rule in WAC 480-90, including WAC 480-90-238(4), if the exemption is consistent with the public interest, the purposes underlying the regulation, and applicable statutes. This petition describes why a temporary exemption from WAC 480-90-238(4) is in the public interest and why it is consistent with the underlying purpose of the Commission’s IRP rules.<sup>1</sup>

**II. BACKGROUND**

2 NW Natural is a natural gas utility and public service company doing business in

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<sup>1</sup> No statute requires a natural gas utility to file an IRP; rather it was established by rule. *See In the Matter of Commission Staff’s Petition for an Order Granting Exemption from the Requirements of WAC 480-100-238(4)-(5) and WAC 480-90-238(4)-(5)*, Docket Nos. UE-180607 & UG-180608, Order 02, at P. 9 (2019).

the State of Washington and is subject to the jurisdiction of the Commission regarding rates and terms of natural gas service in Washington. The Company's principal place of business is 220 NW Second Avenue, Portland, Oregon 97209. Communications regarding this petition should be addressed to:

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### III. DISCUSSION

#### A. The Temporary Exemption is in the Public Interest.

3 Absent an extension to the current August 21, 2020 filing deadline, NW Natural would not be able to incorporate studies related to its storage facilities into the IRP. The Company's 2018 IRP found that some of these facilities are aging and have mechanical and operational issues that would require further study to evaluate the appropriate next steps for the facilities.<sup>2</sup> Although NW Natural is diligently studying the relevant options, the studies are still underway and will not be completed by August 21, 2020. Changing the filing date to February 26, 2021 will provide the Commission, our customers, and stakeholders with better information than filing an IRP that does not include a thorough

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<sup>2</sup> See 2018 NW Natural IRP, pages 6.23-6.24.

analysis of these options. Therefore, NW Natural believes that a temporary exemption is in the public interest.

4           NW Natural also believes that a temporary exemption is in the public interest because of the ongoing investigation in docket U-190818. In that docket, the Commission is gathering information related to renewable natural gas (“RNG”) programmatic design and pipeline safety standards. In addition, Oregon is in the process of drafting rules for its own RNG program.<sup>3</sup> Both of these dockets are expected to conclude later this year, and will likely impact the Company’s analysis of RNG in the IRP. However, there is not sufficient time for NW Natural to incorporate the results of these dockets and still file its IRP by August 21, 2020. NW Natural believes it is in the public interest to have sufficient time to take these dockets into account in drafting its IRP.

**B.     The Temporary Exemption is Consistent with the Underlying Purpose of the IRP Rules.**

5           NW Natural’s petition to extend the filing date of its IRP to February 26, 2021, is consistent with the underlying purpose of the IRP rules:

**WAC 480-90-238 Integrated Resource Planning.** 1) Purpose. Each natural gas utility regulated by the commission has the responsibility to meet system demand with the least cost mix of natural gas supply and conservation. In furtherance of that responsibility, each natural gas utility must develop an "integrated resource plan.

6           NW Natural believes that a thorough analysis of its storage facilities, as well as the RNG rules that are currently in development, will have a direct impact on the accuracy and transparency of its IRP planning process. Therefore, this petition is consistent with the

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<sup>3</sup> Public Utility Commission of Oregon Docket No. AR 632.

purpose of the Commission's IRP rules.

**C. Revised IRP Work Plan Filing**

7 On August 23, 2019, NW Natural filed its IRP work plan in this docket. If this petition is approved, NW Natural will work with stakeholders to develop and file an updated work plan within 30 days of Commission approval or within the timeframe otherwise specified by the Commission. In addition, NW Natural has canceled its first technical working group meeting, which was scheduled for January 22, 2020. The Company has already notified Staff and other interested stakeholders of this cancelation. However, if this petition is denied, the Company has an "open" meeting scheduled for March 12, 2020, allowing it to maintain its current technical working group meeting schedule, albeit without the significant benefits stated above.

**IV. CONCLUSION**

8 NW Natural respectfully requests that the Commission issue an order allowing for a temporary exemption from WAC 480-90-238(4), and authorizing the Company to file its IRP by February 26, 2021. For the reasons provided above, this exemption is in the public interest and is consistent with the with the underlying purpose of the Commission's IRP rules.

Respectfully submitted this 14<sup>th</sup> day of January, 2020.

**NW NATURAL**

*/s/ Ryan Sigurdson*

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