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VIA ELECTRONIC FILING

Steven King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket No. U-161024 – NW Natural Comments on Public Utility Regulatory Policies Act, Obligations of the Utility to Qualifying Facilities, WAC 480-107-105.

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”) provides the following general comment in accordance with the Washington Utilities and Transportation Commission’s Notice of Opportunity to File Written Comments issued in Docket U-161024 on March 14, 2018:

NW Natural appreciates the opportunity to provide comments in response to the draft policy statement. NW Natural does not have specific comments or suggestions relative to the specific language. However, renewable power continues to be developed and the potential for excess renewable power continues to increase. Additionally, technology to generate hydrogen by using excess renewable power for electrolysis of water continues to improve and become more economic. Therefore NW Natural would ask that any language that is adopted consider including hydrogen generated through electrolysis using excess renewable power as within the definition of “renewable resources” for purposes of satisfying the requirement for “fuel use” as defined in 18 CFR 292.204.

Once again, NW Natural appreciates the opportunity to offer comments. Please direct questions regarding these comments to Anna Chittum at 503-226-4211, extension 2492.

Sincerely,

/s/ Tamy S. Linver

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