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April 4, 2019

NWN WUTC Advice No. 19-01

VIA ELECTRONIC FILING

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

State Of WASH.
 UTIL. AND TRANSP.
 COMMISSION

04/04/19 14:08

Received
 Records Management

Re: Rate Schedule 41 and Rate Schedule 42—Changes to Annual Winter Sales WACOG election date; and General Rules and Regulations—Housekeeping update to Pipeline definition

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith the following revisions to its Tariff WN U-6, stated to become effective with service on and after **May 10, 2019**:

Eighth Revision of Sheet 141.2	Rate Schedule 41	Non-Residential Firm Sales and Firm Transportation Service (continued)
Fifth Revision of Sheet 141.3	Rate Schedule 41	Non-Residential Firm Sales and Firm Transportation Service (continued)
Eighth Revision of Sheet 142.2	Rate Schedule 42	Large Volume Non-Residential Sales and Transportation Service (continued); and
Seventh Revision of Sheet 142.3	Rate Schedule 42	Large Volume Non-Residential Sales and Transportation Service (continued)
Seventh Revision of Sheet 00.6	General Rules and Regulations	Definitions

Purpose

The purpose of this filing is two-fold:

- (1) To change the annual Winter Sales weighted-average cost of gas (WACOG) election date to August 15 from September 15; and
- (2) To make a housekeeping change to update the definition of Pipeline in the definitions section of the Company's tariff.

Proposed Changes

Winter Sales WACOG election date

This proposed change will provide customers that request Winter Sales WACOG sufficient time to provide the required electric service to the Advanced Automated Meter Reading (AAMR) meter before the November 1 effective date. An AAMR meter is a required condition of service

for customers electing Winter Sales WACOG in order for the Company to obtain the data necessary for billing based on a calendar-month cycle.

Over the years, NW Natural has found that it is often difficult for customers to complete the work required to comply with the condition of service to provide electric service to the AAMR device within the current limited 45-day time period.¹ The result has been in many cases either a delay in the effective date of the customer's elected service, or a delay in NW Natural's billing of a customer's elected service until the customer has met the condition. Neither outcome is desirable. The proposed additional 30 days should provide sufficient time for customers to fulfill this condition of service, while the timing still remains consistent with the provisions of the tariff that provide for the election date for Winter Sales WACOG occurring after the initial July 31 annual election date.

Updated Pipeline definition

Currently, the Company's tariff defines Pipeline as Northwest Pipeline Corporation. NW Natural proposes to update the definition for additional pipelines that are not part of the Company's distribution system. This update is necessary to clarify that additional pipelines besides Northwest Pipeline Corporation exist that are not part of the Company's distribution system and may interconnect with the Company's system. Expanding the definition to include Coos County Pipeline, Kelso-Beaver Pipeline or other pipelines that interconnect with the Company's system will alleviate confusion and add transparency in using the Pipeline definition with other definitions and throughout the Company's tariff.

The Company respectfully requests that the tariff sheets filed herein be approved to become effective with service on and after May 10, 2019.

As requested by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

Please address correspondence on this matter to me with copies to the following:

eFiling
NW Natural Rates & Regulatory Affairs
220 NW Second Avenue
Portland, Oregon 97209
Telecopier: (503) 721-2516
Telephone: (503) 226-4211, ext. 3589
eFiling@nwnatural.com

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¹ See section "Pre-Requisites to Service" in Schedules 41 and 42.

Sincerely,

NW NATURAL

/s/ Natasha Siores

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Attachments:

NEW-NWN-WUTC-Advice-19-01-Trf-Sheet-141-2-04-04-2019
NEW-NWN-WUTC-Advice-19-01-Trf-Sheet-141-3-04-04-2019
NEW-NWN-WUTC-Advice-19-01-Trf-Sheet-142-2-04-04-2019
NEW-NWN-WUTC-Advice-19-01-Trf-Sheet-142-3-04-04-2019
NEW-NWN-WUTC-Advice-19-01-Trf-Sheet-00-6-04-04-2019