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August 11, 2017

NWN WUTC Advice No. 17-05 / UG-\_\_\_\_\_

**VIA ELECTRONIC FILING**

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

RE: General Rule 11 "Determination of Thermal Units"

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company"), files herewith the following revisions to its Tariff WN U-6, stated to become effective with service on and after **September 13, 2017**:

Third Revision of Sheet 11.1  
General Rule 22,  
"Determination of Thermal Units."

The purpose of this filing is to propose clarifying revisions to portions of General Rule 11 "Determination of Thermal Units" ("Rule 11") of the Company's Tariff as follows:

1. Restate the billing factor formula for clarity. The current language appears to combine the therm calculation and billing factor calculations which can be confusing to the reader. The proposed change will eliminate this confusion.
2. Correct a typographical error in the atmospheric pressure formula to change "PSIG" to "PSIA."

Because none of the revisions discussed above result in a change from current policy of business practice, the Company views these changes as housekeeping clarifications.

There is no effect on Company revenues as a result of the changes proposed herein.

The Company respectfully requests that the tariff sheets filed herein be approved to become effective with service on and after September 13, 2017.

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

A copy of the filing is available for public inspection in the Company's main office in Portland, Oregon and on its website at [www.nwnatural.com](http://www.nwnatural.com).

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

eFiling  
Rates & Regulatory Affairs  
NW Natural  
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If you have any questions, please contact me at 1-503-721-2452.

Sincerely,

NW NATURAL

*/s/ Onita R. King*

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Attachments:

UG-\_\_\_\_-NWN's WUTC Advice 17-05\_Rule 11\_Sheet 11.1 – 08-11-2017