

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

NORTHWEST NATURAL GAS
COMPANY DBA NW NATURAL

For an Accounting Order Authorizing
Deferred Accounting Treatment for the
Financial Assistance Distributed Under the
Washington Interim Participatory Funding
Agreement

DOCKET NO. UG-_____

PETITION

1 Pursuant to WAC 480-07-370(3)(b), Northwest Natural Gas Company (“NW Natural” or the “Company”) petitions the Washington Utilities and Transportation Commission (the “Commission”) for an order authorizing the deferred accounting treatment for the financial assistance distributed under the Washington Interim Participatory Funding Agreement. NW Natural seeks to defer all costs associated with such assistance under the Washington Interim Participatory Funding Agreement in order to track and preserve them for separate ratemaking treatment. The Company will file a proposal to amortize the deferred costs where the prudence of these costs will be reviewed.

2 In support of this Petition, NW Natural states as follows:

I. NAME OF PETITIONER

3 NW Natural is in the business of furnishing natural gas service within the State of Washington as a public service company and is subject to the regulatory authority of the Commission as to its rates, service, facilities, and practices. Its full name and mailing address for the purposes of this proceeding are:

Northwest Natural Gas Company
c/o Zachary Kravitz
Vice President of Rates and Regulatory Affairs
250 SW Taylor Street
Portland, OR 97204-3038

4 The name and address of the Company's attorney for purposes of this proceeding are:

Ryan Sigurdson
Regulatory Attorney (WSBA #39733)
250 SW Taylor Street
Portland, OR 97204-3038

II. SUPPORT FOR PETITION

A. Legal Authority

5 The Commission is vested by statute with the authority to regulate, among other things, the rates and accounts of public service companies, including gas companies.¹ WAC 480-07-370(1)(b) allows public service companies to file petitions, including petitions for deferred accounting.² The Commission grants petitions for deferred accounting where “good cause” is shown.³

B. Factual Background

6 On February 14, 2022, Puget Sound Energy, Avista Corporation d/b/a Avista Utilities, PacifiCorp d/b/a Pacific Power & Light Company, Cascade Natural Gas Corporation, Northwest Natural Gas Company d/b/a NW Natural, the Alliance of Western Energy Consumers, NW Energy Coalition, The Energy Project, Sierra Club, Front & Centered and

¹ RCW 80.01.040, RCW 80.04.160, RCW 80.28.020; *see also In the Matter of the Petition of Nw. Nat. Gas Co. for an Accounting Order Authorizing Deferred Accounting Treatment of Certain Costs Associated with Environmental Remediation*, Docket UG-110199, Order 01 (June 30, 2011).

² *See* UG-110199, Order 01 ¶ 6.

³ UG-110199, Order 01 ¶ 10; *see also In the Matter of the Petition of Avista Corp. d/b/a Avista Utils. for an Accounting Order Authorizing Deferred Accounting Treatment for Residential and Farm Energy Exchange Benefit Amounts*, Docket UE-071091, Order 01 ¶ 11 (Aug. 29, 2007).

Spark Northwest filed a petition seeking to enter into a funding agreement with certain customer advocacy groups to enhance public participation in the Commission’s regulatory process pursuant to RCW 80.28.430. Under the Interim Agreement, the Commission allows the Participating Public Utilities to recover all Fund Grants amounts in rates. Furthermore, RCW 80.28.430 provides: “The commission shall allow a gas company or electrical company to defer inclusion of those [financial assistance] amounts in rates if the gas company or electrical company so elects.” For these reasons, NW Natural respectfully requests to recover the incremental costs through deferred accounting.

C. Estimated Amounts Subject to Deferral

7 NW Natural estimates that around \$72,735 will be recorded in the deferred account for 2022.

D. Proposed Accounting

8 The Company proposes to account for the costs associated with the financial assistance distributed under the Washington Interim Participatory Funding Agreement by recording the deferral in Account 182.3 – Other Regulatory Asset.

III. RELIEF REQUESTED

9 NW Natural requests authorization to defer the financial assistance, as described above, including the carrying costs specified in section 7.9 of the Interim Funding Agreement.

10 WHEREFORE, the Company respectfully requests that the Commission enter an order approving deferred accounting treatment for the financial assistance distributed under the Washington Interim Participatory Funding Agreement, as described in this Petition.

Dated this 11th day of October 2022.

Respectfully Submitted,

/s/ Kyle Walker

NORTHWEST NATURAL GAS COMPANY

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