Onita R. King Rates & Regulatory Affairs Tel: 503.721.2452 Fax: 503.721.2516 email: ork@nwnatural.com



220 NW 2ND AVENUE PORTLAND. OR 97209 TEL 503.226.4211

www.nwnatural.com

October 8, 2014

NWN WUTC Advice No.14-6

Steven V. King, Executive Director & Secretary Washington Utilities and Transportation Commission 1300 S Evergreen Park Drive SW Post Office Box 47250 Olympia, Washington 98504-7250

Re: Schedule E: Distribution Facilities Extensions for Applicant-Requested Services and Mains" – New Construction and Planned Developments

Northwest Natural Gas Company, dba NW Natural (NWN or the "Company") files herewith the following revisions to its Tariff WN U-6, stated to become effective with service on and after November 17, 2014, as follows:

Third Revision of Sheet E.4, Schedule E, "Distribution Facilities Extensions for Applicant-Requested Services and Mains."

The purpose of this filing is to revise Schedule E to require the installation of conduit in the utility pathway for new construction and planned development service line installations, eliminating the option to leave the utility pathway open for the Company to complete the installation. An open pathway will still be required for main line installations within a planned development.

The conduit option has always been an available service line installation choice for builders, with about eighty percent of the builders across NW Natural's Oregon and Washington service territory already choosing this option. The Company provides the conduit at no charge, but the builder is required to pick up the conduit at the appropriate NW Natural service center. This process has worked very well for both the Company and for the builders for many years.

In an open pathway situation, time is of the essence. Changes in weather or in the builder's schedule can adversely impact the integrity of the pathway and can result in construction delays, wasted trips by the Company's crews, and wasted trip fees to the builder. The change to a conduit installation for service lines will eliminate the majority of the installation delays because the builder won't need to notify the Company until the service line conduit is installed, and any changes in weather or delays in the builder's schedule will have no impact on the Company crews that install service lines.

The Company has been surveying builders about this potential change and has received positive feedback and support. However, we do expect that for some builders a transition period will be needed beyond the requested November 17, 2014 tariff effective date. The Company's plan is to have all builders fully transitioned to the service line conduit installation requirement by January 1, 2015.

The Company respectfully requests that the tariff sheets filed herewith be approved to become effective with service on and after November 17, 2014.

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

Copies of this letter and the attached filing are available in the Company's main office in Portland, Oregon, and on its website at <u>www.nwnatural.com</u>.

Please address correspondence on this matter to me at <u>ork@nwnatural.com</u>, with copies to the following:

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

Sincerely,

NW NATURAL

/s/ Onita R. King

Onita R. King Rates & Regulatory Affairs

attachments