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August 7, 2017

NWN WUTC Advice No. 17-04 / 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: Revisions to Schedule T "Customer-Owned Natural Gas Transportation Service"

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**:

Sixth Revision of Sheet T.1
Schedule T,
"Customer-Owned Natural Gas Transportation Service:" and

Fifth Revision of Sheet T.4, Schedule T, "Customer-Owned Natural Gas Transportation Service (continued)."

The purpose of this filing is to propose clarifying revisions to portions of Schedule T "Customer-Owned Natural Gas Transportation Service" ("Schedule T") of the Company's Tariff as follows:

1. Revisions are proposed at Sheet T-1 to items 2 and 3 of the Prerequisites to Service.

First, item 2 is revised to add language regarding the Customer's responsibilities with regard to Advanced Automated Meter Reading (AAMR), the metering technology used for billing purposes. This language is consistent with language found in the respective Rate Schedules (Rate Schedules 41, 42, and 43) under which a Customer would pay for Schedule T Transportation service.

Second, item 3 is revised to clarify when the authorized supplier/agent form must be received by the Company following a Customer's election for Transportation Service. The timing for receipt of this information is different when a request for Transportation service is submitted during the annual service election period than when it is submitted as an out-of-cycle request.

Neither of the changes discussed above represent a change in business practice.

2. Revisions are proposed at Sheet T-4 to clarify how imbalance charges are calculated under Option 1 of the two options available to a customer when an imbalance is not

Washington Utilities & Transportation Commission NWN WUTC Advice No. 17-04 August 7, 2017, Page 2

brought within allowed tolerances by the end of a balancing period. The proposed change will bring the tariff language in line with long-standing billing practices.

Editorial changes are also proposed to the paragraph leading into the Option 1 provision to remove the misleading language "to clear the imbalance" as Option 1 does not result in the clearing of the imbalance therms.

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.

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

eFiling
Rates & Regulatory Affairs
NW Natural
220 NW Second Avenue
Portland, Oregon 97209
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If you have any questions, please contact me at 1-503-721-2452.

Sincerely,

**NW NATURAL** 

/s/ Onita R. King

Onita R. King Rates and Regulatory Consultant, Compliance NW Natural 220 NW 2<sup>nd</sup> Avenue Portland, OR 97209 Tel: 503.721-2476

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## Attachments:

UG-\_\_\_\_-NWN's WUTC Advice 17-04\_Schedule T\_Sheet T-1 - 08-07-2017 UG-\_\_\_\_-NWN's WUTC Advice 17-04\_Schedule T\_Sheet T-2 - 08-07-2017