

**GAIL HAMMER**  
Tariffs and Regulatory Compliance  
Tel: 503.226.4211, ext 5865  
Fax: 503.721.2516  
email: gail.hammer@nwnatural.com



**DO NOT REDOCKET**

**VIA ELECTRONIC FILING**

April 7, 2017

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

**Re: UG-170199 - DO NOT REDOCKET**  
**Request for Extension of Affiliated Interest and Subsidiary Transactions Report**

Northwest Natural Gas Company, dba NW Natural, has historically filed its Affiliated Interest report with the Washington Utilities & Transportation Commission (WUTC) on June 1 which is coincident with its Affiliated Interest report submission in the state of Oregon. It recently came to our attention that this practice was inconsistent with WAC 480-90-264, which calls for the report to be filed by 120 days from the end of the utility's calendar or fiscal year. Because this discrepancy was only recently realized, NW Natural has not had sufficient time to redirect its resources to accomplish the earlier filing date, and the required resources are currently constrained due to annual and quarter close processes for accounting that must be completed at this time of year. For this reason, NW Natural filed on March 27<sup>th</sup> a waiver from WAC 480-90-264. NW Natural files this letter to provide the further explanation, stated above, of the reasons it made this request. NW Natural believes that a better description of its request may be that it is seeking an extension of the date by which it files the report. In the future, NW Natural will redirect its resources to ensure that it can meet the date provided for in the rule.

Thank you for your consideration of this matter. Please contact me should you have questions or require additional information.

Sincerely,



Gail Hammer  
Rates and Regulatory Consultant 2

Date: 4/7/17