



July 25, 2019

RECEIVED

JUL 29 2019

Kurt Young
PDC Compliance Officer
711 Capitol Way, Rm 206
PO Box 40908
Olympia, 98504-0908

 **COPY**

Public Disclosure Commission

Dear Mr. Young,

This letter is in response to our conversation regarding a complaint filed on June 13, 2017 against the Natural Gas PAC (Committee) alleging that the Committee made two monetary contributions during the 2016 election to two candidates but failed to file an out of state committee report (C-5 report).

When the complaint was made, my predecessor, Gary Bauer, discussed the complaint with staff from the Washington Attorney General's office and explained that NW Natural (the Company) is a corporation doing business in Washington state and is regulated by the WUTC. As such, the Company employed a registered lobbying firm and reported all associated expenses via the "L" form reporting track. This included the questioned contributions contained in the complaint. Mr. Bauer understood at the time that the complaint had no validity since the contributions were both reported in a timely fashion and made by a corporation with an in-state nexus.

As I communicated with you during our telephone conversation, my predecessor, Gary Bauer, believed that this issue had been resolved. I now understand that this issue has not been resolved and our case is still considered open. It is the intention that this letter and the completed Form C5 (see attached) will resolve this issue.

Thank you for your assistance and please don't hesitate to contact me if you need any additional information or action.

Kind regards,



Kathryn Williams
VP, Public Affairs
NW Natural

Out-of-State Political Committee Campaign Finance Report

1. Name and full address of committee making the contribution

Name **Kathryn Williams**
Street address **220 NW Second Ave**
City / State / Zip **Portland, Oregon, 97209**

2. Check appropriate box

- ☒ This is the first report submitted during 20__
☐ This shows new expenditures, contributions or information changed from reports submitted previously this calendar year.

3. Provide the purpose of the committee and the identity of any business, union, association or person with which the committee is affiliated (e.g., a State Committee of the Oregon Republican Party, Idaho committee of United Workers Union or federal PAC of XYZ Trade Assn.)

Natural Gas PAC

4. Officers or responsible leaders of committee:

Name and full address

Title

Gary Bauer, Former Treasurer, Government Affairs Director (retired)
Kathryn Williams, Treasurer and VP, Public Affairs (current)

5. States where this political committee is registered and has been actively reporting campaign finance information for the preceding two years:

Name of state(s) & administrative agency(s)

Agency(s) website address

Oregon

Oregon Secretary of State
<https://sos.oregon.gov/>

6. Candidate contributions: List each Washington candidate for state, local or judicial office to whom you have made a contribution of more than \$50.00.

Candidate name	Office sought	Political party	Date	Amount
Chris Reykdal	School Superintendent	N/A	10/4/2016	\$500.00
Pat McCarthy	Auditor	N/A	10/4/2016	\$500.00
(See spreadsheet for legislative candidates)				\$15,976.50

7. Ballot measure committee contributions: List each Washington committee supporting or opposing a ballot measure to whom you have made a contribution of more than \$50.00.

Committee name & full address	Ballot number	For or Against?	Date	Amount
None				

8. Other contributions and expenditures: List each other contribution or expenditure of more than \$50.00 made to or on behalf of any Washington state, local or judicial candidate, ballot measure or political committee.

Recipient name & full address	Purpose	Date	Amount
See spreadsheet for caucus committees			\$4000.00

Check here ☐ if continued on an attached sheet

\$20,976.50

9. Total contributions and expenditures (Add parts 6, 7, 8)

10. Aggregate contributions and expenditures made during this calendar year in Washington State.

Include amounts shown on this report and C5 reports previously submitted this calendar year.

Does this aggregate total represent 20% or more of the committee's nationwide campaign activity to date for this calendar year? Y ☐ N ☒**11. Contributions received from Washington residents.** List all contributions of more than \$25.00 in the aggregate to this out-of-state committee during the current calendar year from Washington residents or corporations with their headquarters or a primary place of business in Washington.

Name and full address	Date	Amount	Aggregate Total
None			

Check here ☐ if continued on an attached sheet**12. Contributions received from persons residing outside of Washington.** List the name, address, and employer of each person or corporation residing outside the state of Washington who has made contributions of more than \$2,680.00 in the aggregate to this out-of-state committee during the current calendar year.

Name and full address	Employer name, city and state	Date	Amount	Aggregate Total
NW Natural Gas	220 NW Second Ave. Portland, OR 97209	12/30/2016	\$100,000	\$100,000

Check here ☐ if continued on an attached sheet**13. Eligibility to Give to Political Committees and State Office Candidates:** A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.☒ A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.**14. Certification:** I certify the information contained in this report is true, complete and correct to the best of my knowledge.

Signature of Committee Official

Name – Typed or Printed

Kathryn M. Williams

Title VP, Public Affairs

Daytime Telephone No. () 503.220.2370

E-Mail Address kathryn.williams@nwnatural.com

NW Natural Gas - Attachment

WA SENATE DEMO CAMP	8/1/2016	\$1,000.00	
HOUSE DEMO CAMP COMM	8/4/2016	\$1,000.00	Full election
HOUSE REPUB ORG COMM	8/26/2016	\$1,000.00	Full election
SENATE REPUB CAMP COMM	8/15/2016	\$1,000.00	General
		\$4,000.00	

NW Natural Gas (Attachment)

Candidate/Committee Name	Receipt Date	Amount
O'BAN STEVEN T	7/26/2016	\$70.00
CARLYLE REUVEN M	7/16/2016	\$1,000.00
KILDUFF CHRISTINE J	7/15/2016	\$1,000.00
LOVICK JOHNNY R	7/9/2016	\$1,000.00
RIVERS ANNA M	7/15/2016	\$1,000.00
MCDONALD JOYCE	7/18/2016	\$1,000.00
BECKER RANDI L	7/22/2016	\$1,000.00
CHAPMAN MICHAEL C	7/18/2016	\$1,000.00
CHANDLER BRUCE Q	7/9/2016	\$250.00
O'BAN STEVEN T	7/26/2016	\$71.50
O'BAN STEVEN T	7/26/2016	\$10.00
KLIPPERT BRADLEY A	7/29/2016	\$250.00
CHOPP FRANK V	7/19/2016	\$1,000.00
PADDEN MICHAEL J	7/23/2016	\$500.00
SAWYER DAVID J	7/16/2016	\$1,000.00
SCHMICK JOSEPH S	7/9/2016	\$250.00
JOHNSON NORMAN M	7/27/2016	\$250.00
DYE MARY L	7/25/2016	\$250.00
SULLIVAN PATRICK J	7/28/2016	\$1,000.00
O'BAN STEVEN T	7/26/2016	\$575.00
FITZGIBBON JOSEPH C	8/2/2016	\$1,000.00
KING CURTIS P	7/18/2016	\$1,000.00
MCCABE GINA R	7/23/2016	\$250.00
WILCOX JAMES T III	7/19/2016	\$1,000.00
HALER LAWRENCE E	7/22/2016	\$250.00
		\$15,976.50