

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1654

In the Matter of)
)
)
 NORTHWEST NATURAL GAS)
 COMPANY, dba NW NATURAL,)
)
 Investigation of Interstate Storage and)
 Optimization Sharing.)
 _____)

SECOND POST-HEARING BRIEF OF THE
CITIZENS' UTILITY BOARD OF OREGON

August 7, 2014



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OF OREGON
UM 1654**

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| NORTHWEST NATURAL GAS |) | OF THE CITIZENS' UTILITY |
| COMPANY, dba NW NATURAL, |) | BOARD OF OREGON |
| |) | |
| Investigation of Interstate Storage and |) | |
| Optimization Sharing. |) | |
| _____ |) | |

1 **I. CUB's Closing Arguments.**

2 **A. The Appropriate Standard Of Review Is The ORS 757.210(1)(a) Standard**

3 The Company views this as a policy docket where the allocation of the
4 burden of persuasion is not an issue; rather, any party proposing any
5 sharing arrangement must demonstrate that their proposed arrangement
6 will cause just and reasonable rates.¹

7 This UM 1654 docket arose out of the UG 221 General Rate Case. Northwest Natural
8 Gas Company ("NWN" or "Company") had the burden of proof in that General Rate
9 Case to show that all elements used to determine customer rates were just and reasonable
10 including costs and revenues associated with both the Storage and Optimization
11 programs. NWN's burden did not change with the agreement by the parties that the
12 storage and optimization issues, which were not time sensitive, would be resolved in a

¹ UM 1654 Northwest natural Gas Company's Post-Hearing Brief/24 lines 17-19.

1 separate docket so as to limit the number of issues moving forward to the Commission in
2 the rate case.

3 Thus, the issue of Mist sharing was a contested issue in UG 221 General Rate
4 Case. Now, because Staff has switched its position between the UG 221 and UM 1654
5 cases, the optics of the UM 1654 docket give the appearance, to the uninitiated, that CUB
6 is a complainant arguing against an accepted methodology. That is not correct. This
7 docket was opened pursuant to the Second Partial Stipulation from the UG 221 docket to
8 deal with the leftover sharing issue from Docket UG 221 where CUB's position at that
9 time was somewhere between Staff and the Company. The Second Partial UG 221
10 Stipulation stated as follows:

11 Staff and CUB proposed altering the existing sharing mechanism for
12 Schedule 185—Special Annual Interstate Storage and Transportation
13 Credit and Schedule 186—Special Annual Core Pipeline Capacity
14 Optimization Credit. The Parties agree that the sharing mechanisms set
15 forth currently in these schedules will remain in place for the time being.
16 However, the Parties will jointly request that a new contested case docket
17 be opened to evaluate these sharing mechanisms.²

18 Today, notwithstanding the above Stipulation language, NWN takes issue with
19 CUB's request to have the ORS 757.210 standard of review applied to this docket
20 claiming that since CUB is the one who wants the percentages changed the burden should
21 be on CUB.³ As stated above, this is not how rate case issues should be treated. The
22 Commission should be aware that if it grants NWN's request to change the standard of
23 review applicable to this docket to something lesser than the ORS 757.210 standard, then
24 CUB will never again be able to agree to the bouncing of issues out of a rate case for later

² UG 221 Second Partial Stipulation /7 at Section 29.

³ UM 1654 Northwest Natural Gas Company's Post-Hearing Brief/24 – 26, Section D.

1 deliberation – the fear of the loss in the burden of proof standard would be too great.
2 Removal of the issue from the General Rate Case, and into a separate investigatory
3 docket, should not alter the applicable standard of review and the Commission should
4 find pursuant to the ORS 757.210 standard of review that NWN has failed to carry its
5 burden to prove that the sharing percentages should stay the same.

6 CUB notes, however, that even were the Commission to apply the lesser standard
7 of review requested by NWN, CUB’s position would still prevail in this matter – CUB
8 has met the burden of showing that the current NWN sharing percentages are not based in
9 fact and that they should be changed. NWN, on the other hand, has had multiple chances
10 to advocate its position but with each rendering has succeeded only in further confusing
11 the issues – the bench request responses and the last hearing being prime examples. A
12 company which cannot prove its position should not be held to have met its burden of
13 proof Moreover, as the Commission stated in UG 221 “[s]imply having a witness testify
14 in conclusory fashion, that all other options were inferior, is not adequate to justify a
15 major investment.”⁴ Likewise, in this docket, having Mr. White and Mr. Freidman testify
16 repeatedly in conclusory fashion without reference to factual evidence should not suffice
17 to carry the burden.

18 CUB respectfully requests that the Commission apply the ORS 757.210 standard
19 of review and then find that NWN has failed to meet the standard.

⁴ UG 221 Order No. 12-437 at 17 fn. 43.

1 **B. NWN Passed The Risk To Tenaska – NWN Has No Basis For An Oversized**
2 **Incentive**

3 In its first Post-Hearing Brief, NWN continues to argue that it takes risks above
4 and beyond normal LDCs⁵ but it also tells us that “[s]peculation like that involved in the
5 Optimization Activities is prohibited by NW Natural’s Gas Supply Risk Management
6 Policy, which states: [REDACTED]

7 [REDACTED]
8 [REDACTED]”⁶ This is why the Company has
9 the contract with Tenaska—so Tenaska can take the risks and engage in the speculation
10 that NWN is prohibited by its own policies from engaging in – “absent risk mitigation
11 measures, such as those provided by NW Natural’s AMA [Tenaska], the Company could
12 not engage in the Optimization Activities in the normal course of its LDC business.”⁷

13 The Company wants to slice this too many ways. Were CUB to agree that NWN was in
14 fact taking risks and involving itself in speculative activities, then CUB would have to
15 argue that NWN was doing something imprudent and should no longer be allowed to do
16 it. But CUB does not believe that NWN is engaging in speculative activities, its risk
17 management policies prohibit it from doing so and it has a contract with Tenaska that
18 says Tenaska takes the risk. As argued by CUB throughout this docket, NWN carries
19 little significant risk and, therefore, does not deserve an oversized incentive.

⁵ UM 1654 Northwest Natural Gas Company’s Post Hearing Brief/6 lines 6-7.

⁶ NWN also cites to UG 135/UM 1215, Order No 05-1053, Appendix A at 12 (September 29, 2005) for the proposition that Staff has said LDCs cannot do speculative things and also to UG 191, Order No. 10-445, Appendix A at 20, n.6 (November 5, 2010) for the proposition that “no Oregon LDC participates in speculation in any market.” In CUB’s opinion this only proves CUB’s point. If NWN is not engaging in speculation then it carries no significant risk and there is no reason to give it a significant incentive.

⁷ UM 1654 Northwest Natural Gas Company’s Post Hearing Brief/7 lines 1-3.

1 **C. NWN Has Filled The Record With Unsubstantiated Facts – The Commission**
2 **Should Give Little Weight to Unsubstantiated Facts**

3 ***1. The March 5, 2014 Bench Request Response to the First Question.***

4 NWN has limited information about which LDCs employ companies
5 to extract and sell natural gas liquids, and the details of those
6 arrangements.⁸

7 Strangely, this does not stop NWN from moving forward with entirely unsupported (no
8 citations, no affidavits) responses to the Commission’s Bench Request. In a court
9 proceeding, and in certain circumstances even in an administrative proceeding, CUB
10 might move to strike this kind of unsupported testimony but given the difficulties that all
11 parties have had in eliciting any fact based information from the Company in this docket,
12 CUB felt it better to leave the unsupported testimony in the record so as to further
13 demonstrate NWN’s complete inability to produce fact based evidence to support any of
14 its claims.

15 ***2. NWN’s Post-Hearing Brief.***

16 Other examples of this unsupported testimony appear in NWN’s Post-hearing
17 Brief at 8-9 wherein NWN discusses Avista optimization without citation to anything fact
18 based. And NWN’s citation to its own speculation regarding its [REDACTED]

19 [REDACTED]

20 [REDACTED]⁹

21 CUB respectfully requests that the Commission give no weight to NWN’s
22 completely unsupported (no affidavits from Cascade, Avista, Fortis or others and no

⁸ UM 1654 NWN March 5, 2014 Response to February 21, 2014 Commission Bench Requests/2
⁹ UM 1654 Northwest Natural Gas Company’s Post-hearing Brief/9 especially line 7 (*emphasis added*).

1 citation to case law) testimony that appears in its First Post-Hearing Brief and in the
2 Answers to the first set of Bench Requests.

3 **2. Other LDCs and Optimization.**

4 NWN argues that CUB was only able to show that a few LDCs do things like
5 NWN.¹⁰ In response to NWN's inflated claims as to its uniqueness, CUB did cite to
6 other utilities who also engage in optimization.¹¹ This was in no way intended to be an
7 exhaustive list on CUB's part it was only meant to show that NWN is not unique. CUB's
8 evidence demonstrates that. And NWN's evidence demonstrates only that its sharing
9 percentage is the wrong one – which ties nicely with CUB's arguments. NWN's research
10 found that five LDCs had 75/25 sharing, one had 70/30 sharing and one had 60/40
11 sharing.¹² Thus to use NWN's terminology, the vast majority of the surveyed LDCs had
12 customer sharing percentages higher than NWN's – only one surveyed LDC was lower.

13 Furthermore, Tenaska optimizes only core customer working gas – no other gas.¹³
14 As detailed in CUB's First Post-Hearing Brief, NWN receives 80% of the revenues from
15 interstate storage, and customers receive 67% of the revenues from the portion of
16 optimization allocated to core customers, NW Natural's split of Mist Optimization levels,
17 leaves the Company retaining more than half of the Mist optimization revenues, even
18 though all of the optimized gas is core customer working gas. The sharing percentages
19 devised by NWN look like this:

- 20 • Shareholders
21 • $(47\% \times 80\%) + (53\% \times 33\%) = 55\%$

¹⁰ UM 1654 Northwest Natural Gas Company's Post-hearing Brief/7 lines 5-6.

¹¹ UM 1654 CUB/200 Jenks-McGovern/13 lines 9-28 through /15 lines 1-4.

¹² UM 1654 Northwest Natural Gas Company's Post-Hearing Brief/10 lines 13-14.

¹³ UM 1654 CUB/109 Jenks-McGovern (NWN Data Response to CUB DR 4).

- 1 • Customers
- 2 • $(47\% \times 20\%) + (53\% \times 67\%) = 45\%$ ¹⁴

3 No other utility identified by the Company or CUB has been allowed to keep the majority
4 share of the earnings from optimization. This is why CUB advocates strongly for the
5 position that since only one set of customer gas is being used for optimization, that only
6 one sharing percentage should be used for sharing. Because NWN has been able to base
7 its sharing on multiple factors, it has the ability to manipulate the sharing percentage
8 giving itself the majority of the earnings from optimization 45 customers /55
9 shareholders.

10 In addition to the above, CUB notes that NWN’s claims within its own Post-
11 Hearing Brief are inconsistent. On page 2 of its brief, it emphatically states, “[a]nd in
12 *every single case*, the LDC is specifically incented to engage in the activities through
13 revenue sharing; in the *vast majority* of the cases the sharing arrangement is closer to NW
14 Natural’s current sharing arrangement than the 90/10 sharing recommended by CUB.”¹⁵
15 But on page 10 of its Post Hearing Brief, it states “[i]n virtually every case, the LDC is
16 provided an incentive.”¹⁶ As CUB has pointed out, Avista operates as an LDC in
17 Washington, conducts optimization asset management activity and passes 100% of the
18 gain to its customers without any sharing with the Company.¹⁷ There is a big chasm
19 between “in every case” and “in virtually every case.” Nothing NWN has said in this
20 docket is ever black and white or 100% reliable – NWN is losing credibility due to its

¹⁴ UM 1654 CUB’s First Post-Hearing Brief/6 lines 9-17.

¹⁵ UM 1654 Northwest Natural Gas Company’s Post-Hearing Brief/2 lines 23-24 and at /3 lines 1-2
(*emphasis added*).

¹⁶ UM 1654 Northwest Natural Gas Company’s Post-Hearing Brief/10 lines 3-4.

¹⁷ UM 1654 – CUB/200/Jenks-McGovern/13-14.

1 unwillingness to be transparent in its dealings with customer groups in dockets, its
2 unwillingness to provide factual information and its unwillingness to admit when
3 something is not what it previously reported.¹⁸

4 CUB further notes that in attempting to assert its uniqueness once again, NWN
5 once again strays to the line between prudence and imprudence as it tries to argue that the
6 difference between what [REDACTED]

7 [REDACTED] “ [REDACTED].

8 On the other hand, due to NW Natural’s incentives – both in its AMA and in Schedules
9 185 and 186 – the Company works closely with Tenaska to realize significantly more
10 Optimization Activity revenue through more speculative and coordinated transactions –
11 transactions that NW Natural could not enter into on its own.”¹⁹

12 As noted above, if NWN is involved in speculative risk taking then it is outside
13 the purview of its own policies and acting imprudently. If NWN’s incentives are driving
14 it to act imprudently outside of its risk management policies then the Commission should
15 take away the incentives that are causing it to make bad choices.

16 NWN cannot have it both ways. Either it hired Tenaska to do the speculative
17 trading and take the risk or it didn’t and it is acting imprudently. NWN needs to decide
18 which side of the fence it is playing on.

19 CUB thinks the Commission should find that NWN is not unique; NWN hired
20 Tenaska to take the risk and does not therefore merit a significant incentive.

¹⁸ The Commission has commented in the past that the party bearing the burden of proof must offer relevant information into the record. *In re Portland General Electric Company*, OPUC Docket No. UE 196, Order No. 09-046 at 8 (Date) (“We agree with ICNU and CUB that it is inappropriate for the party bearing the burden of proof to omit relevant information from the record due to lack of diligence or tactical restraint.”). CUB agrees.

¹⁹ UM 1654 Northwest Natural Gas Company’s Post-Hearing Brief/7 lines 13-19.

1 **D. NWN has failed to account for all of the assets used in optimization, CUB has**
2 **not.**

3 NWN argues repeatedly that CUB does not recognize the use of other (non-core)
4 Company assets in performing Mist Storage optimization.

5 This is not true. CUB’s First Post-Hearing Brief discusses at length the use of
6 customer and other (non-core interstate) cushion gas, customer and interstate storage
7 working gas and the deliverability as supporting players in the Company’s Optimization
8 program.²⁰ The problem is that NWN has been unwilling or unable to provide a
9 comprehensive listing of all of the actual assets being utilized for sharing, the degree that
10 those assets are shared, and of the cost of each of those utilized assets. For this reason
11 CUB has been unable to place an exact percentage on the use of assets.

12 **E. The Only Gas That NWN Can Currently Legally Use For Optimization Is**
13 **Customer Gas**

14 Without core customer gas in Mist, the company could optimize the
15 resource; however, the Company would be more constrained in its storage
16 Optimization Activities²¹

17 NWN states that it would just use a different resource if it could not use core
18 customer working gas. But NWN has to use customer gas – see DR 4 - this is a “fact”
19 not a “claim.”²² There is no evidence in the record that there is any other resource that
20 NWN could use. While there may be a different way that Tenaska could optimize Mist
21 Storage without using core customer gas at Mist, 1) that is not the issue here and now -

²⁰ UM 1654 CUB’s First Post Hearing Brief/6 lines 2-5; UM 1654 CUB’s First Post Hearing Brief/7 lines 11-15 and 17-21; UM 1654 CUB’s First Post Hearing Brief/9 lines 3-19 and /10 lines 1-2 etc.

²¹ UM 1654 Northwest Natural Gas Company’s Post Hearing Brief/15 lines 17-19.

²² UM 1654 CUB/109 Jenks-McGovern (NWN Data Response to CUB DR 4).

1 here and now is about current activities of the Company at Mist and those activities all
2 use core customer working gas. This is not a theoretical matter it is a fact. 2) There is no
3 evidence in the record about there being “alternative” paths that can be taken, or as to
4 what revenues such alternate paths could be expected to generate. This is a new “Hail
5 Mary” argument tossed in during closing briefs – the Commission should give such
6 hypothetical arguments no weight.

7 **F. NWN Has Failed To Support Its Claims that the 53/47 sharing is based upon**
8 **actual asset ownership percentages.**

9 As discussed in CUB’s First Post-Hearing Brief, NWN needs to prove the
10 ownership of the assets being used for optimization. As things stand, we know that the
11 gas that is used is 100% core customer owned. We also know that many of the other
12 assets in use are also core customer owned – the storage wells etc. NWN has failed to
13 provide any evidence supportive of its claim that the current sharing percentages are
14 based in facts related to the true ownership/cost of assets.

15 **G. It Is Fundamental To Regulatory Rate Making That All Earnings Based**
16 **On System Assets Must Be Reported In The ROO – Sharing Is A**
17 **Creation Of The Commission And Is A Separate Issue: CUB Has Not**
18 **Retreated From These Positions.**

19 At hearing, CUB seemed to retreat from its position that Optimization
20 Activity net revenues must be included in the ROO for the purpose of
21 earnings reviews, and instead emphasized its argument that optimization
22 Activity net revenues should be included in the ROO for the sake of
23 transparency.²³

²³ UM 1654 Northwest Natural Gas Company’s Post-Hearing Brief/24 lines 1-4.

1 The Company argues that because optimization is a discretionary activity,
2 earnings from optimization should not be included in the ROO.²⁴ As CUB has previously
3 testified, using the Company's assets to benefit its core customers is not a discretionary
4 activity.²⁵ And even if it were a discretionary activity because it makes use of core
5 customer assets – at a minimum core customer working gas – the Company is required to
6 report those earnings in its ROO and pass through those earnings to its customers under
7 current regulatory mechanisms. Why NWN thinks it should be treated differently than
8 other utilities who share optimization revenues with their customers at 100% is a mystery
9 to CUB.

10 NWN is misinformed if it thinks that CUB is backing away from any of its
11 positions in this docket. The longer this docket has gone on and the more the Company
12 has failed to be transparent in its dealings with CUB, the more intensely CUB has come
13 to believe that all of the Company's optimization earnings need to be reported in the
14 ROO. Mr. Jenks' testimony at the hearing was merely intended to clarify that the
15 requirement to report all earnings based on system assets in the ROO is a separate issue
16 from the requirement to engage in the sharing of optimization revenues. A sharing
17 mechanism can be designed in many different manners and include different revenues but
18 this is separate from ROO reporting requirements. NWN was attempting to conflate
19 those issues and CUB was merely noting that they should not be conflated. CUB stands
20 firmly by its prior testimony that all earnings based on system assets must be reported in
21 the ROO.²⁶

²⁴ UM 1654 Northwest Natural Gas Company's Post-Hearing Brief/4 lines 4-5.

²⁵ UM 1654 – CUB/200/Jenks-McGovern/8.

²⁶ UM 1654 – CUB/200/Jenks-McGovern/18-19.

1 **H. The Commission May Review Any Procedure At Any Time – NWN Has No**
2 **Basis For A Claim Of Reliance**²⁷

3 As discussed in CUB’s prior briefs²⁸ NWN has no basis upon which to claim
4 reliance. The fact that these programs have been allowed to continue for more than
5 twelve years without review is not cause for celebration but rather for the grinding and
6 gnashing of customer teeth. Few if any other Commission authorized programs have
7 continued for this long without proper in-depth review. It is time that NWN was required
8 to provide appropriate data to permit such review.

9 **III. CUB’S RECOMMENDATIONS**

10 CUB’s recommendations have changed only to accommodate its additional arguments set
11 forth above. CUB recommends that the Commission find that:

- 12 • the appropriate standard of review applicable to this docket is ORS 757.201(1).

13 This UM 1654 docket arose out of the UG 221 General Rate Case. NWN has the
14 burden of proof to show that all elements used to determine customer rates are
15 just and reasonable including costs and revenues associated with both the Storage
16 and Optimization programs.

- 17 • That NWN passed the risk to Tenaska – NWN has no basis for an oversized
18 incentive.

- 19 • NWN has filled the record with unsubstantiated facts to which the Commission
20 will give little weight.

- 21 • NWN has failed to account for all the assets used in Mist Storage Optimization.

²⁷ ORS 756.515.

²⁸ UM 1654 – CUB Pre-hearing Brief/5.

- 1 • the only gas that NWN can currently legally use for Mist storage optimization is
2 customer gas.
- 3 • NWN has failed to support its claims that the 53/47 sharing is based upon actual
4 asset ownership percentages.
- 5 • it is fundamental to Regulatory Rate Making that all earnings based on system
6 assets must be reported in the ROO.
- 7 • the Commission may review any procedure at any time – NWN has no basis for a
8 claim of reliance.
- 9 • the Commission order implementation of a cost based study with appropriate in-
10 depth analysis to be included in the next marginal cost study;
- 11 • pending those results, CUB will not recommend any change to the Inter/Intrastate
12 sharing percentages (20 customer/80 shareholder) (Note: Because of the inability
13 to get good, factual information, CUB believes the Commission might want to
14 expand this cost based study from CUB’s marginal cost approach to a cost study
15 along the lines proposed by Staff in UG 221);²⁹
- 16 • the Commission find that NWN has been misallocating net revenues from Mist
17 Optimization to Interstate/intrastate storage and order that 47% of Mist
18 Optimization Revenues be removed from Interstate/intrastate storage and the
19 sharing percentage for all optimization activities including pipeline optimization
20 should be set at 90% customer/10% utility, though CUB would be supportive of
21 phasing this in with a step which moves the sharing from 67% customer/33%
22 shareholder to 80% customer/20% shareholder (the inverse of the sharing

²⁹ UG 221 Staff/1000/Zimmerman/12 lines 8-19; UG 221 Staff/1900/Zimmerman/13 lines 15-20.

1 percentage for interstate storage); and in addition that the Commission could go to
2 80/20 for Mist optimization if it finds that there is merit to the deliverability,
3 cushion gas, or other working gas arguments made by NW Natural.

- 4 • the Commission find that all AMA Optimization revenues must be included in the
5 Company's ROO as utility income (Note: CUB is not proposing that interstate
6 storage be included in the ROO as utility income).

7 Central to all of CUB's recommendations is the idea that full information disclosure
8 assists all parties in reaching equitable, transparent, and agreeable resolutions. To this
9 end, CUB supports all efforts to ensure that a cost of service analysis is conducted. CUB
10 wishes to see ratepayers and investors both being fairly compensated, which seems only
11 equitable in light of the Commission's statutory duty to impose fair, just and reasonable
12 rates for all.

13 **IV. CONCLUSION**

14 In conclusion, CUB recommends that based on all of the above findings that the
15 Commission order the following:

- 16 1. the appropriate standard of review applicable to this docket is ORS
17 757.201(1). This UM 1654 docket arose out of the UG 221 General Rate
18 Case and moving these issues out to a separate docket did not change the
19 standard of proof or the party having that burden. NWN has the burden of
20 proof to show that all elements used to determine customer rates are just
21 and reasonable including costs and revenues associated with both the
22 Storage and Optimization programs.

- 1 2. the Commission may review any procedure at any time – NWN has no
2 basis for a claim of reliance.
- 3 3. NWN has an obligation to maximize the value of regulated assets,
4 including the use of those assets in a manner which generates revenue
5 from non-retail markets and then use that revenue to reduce its revenue
6 requirement from the customer who financed the assets.
- 7 4. NWN has failed to support its claims that the 53/47 sharing is based upon
8 actual asset ownership percentages.
- 9 5. Compensation for use of customer working gas should be based upon the
10 percentage of customer gas utilized for the purpose of optimization–
11 100% - not upon deliverability provided by supporting gas.
- 12 6. The appropriate sharing percentage for interstate/intrastate storage is
13 20/80 pending the results of the cost study and optimization programs is
14 90/10 customers/shareholders (or alternatively 80/20 because some value
15 is given to the role of deliverability).
- 16 7. The revenues from NWN’s AMA Optimization are not exempt or special.
17 They are normal in the course of modern utility operations, and belong in
18 NWN’s ROO.
- 19 8. Because no cost based study has been conducted of the
20 interstate/intrastate storage and optimization programs in many years and
21 no independent third party evaluation has ever been conducted, a third
22 party must be hired to conduct an in-depth cost based study of both the
23 interstate/intrastate storage and optimization programs.

1 In summary, CUB respectfully requests that the Commission find that NW
2 Natural has failed to carry the burden in this docket and that the optimization sharing
3 percentages should be changed in favor of customers and that a cost study must be
4 undertaken to confirm sharing percentages for the interstate/intrastate program.

Dated this 7th day of August, 2014.

Respectfully submitted,



G. Catriona McCracken, OSB #933587
General Counsel, Regulatory Program Director
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland OR 97205
(503) 227-1984 ph
(503) 274-2956 fax
Catriona@oregoncub.org

UM 1654 – CERTIFICATE OF SERVICE

I hereby certify that, on this 7th day of August, 2014, I served the foregoing **CITIZENS' UTILITY BOARD OF OREGON'S SECOND POST-HEARING BRIEF** in docket UM 1654 upon each party listed in the UM 1654 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and five copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

W CABLE HUSTON BENEDICT
C HAAGENSEN & LLOYD
TOMMY A BROOKS **(HC)**
1001 SW FIFTH AVE, STE 2000
PORTLAND OR 97204-1136
tbrooks@cablehuston.com

W CABLE HUSTON BENEDICT
C HAAGENSEN & LLOYD
CHAD M STOKES **(HC)**
1001 SW 5TH - STE 2000
PORTLAND OR 97204-1136
cstokes@cablehuston.com

W MCDOWELL RACKNER &
C GIBSON
LISA F RACKNER **(HC)**
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205
dockets@mcd-law.com

W NORTHWEST NATURAL
C MARK R THOMPSON (HC)
220 NW 2ND AVE
PORTLAND OR 97209
mark.thompson@nwnatural.com

W NORTHWEST NATURAL
E-FILING
220 NW 2ND AVE
PORTLAND OR 97209
efiling@nwnatural.com

W PUC STAFF--DOJ
C JASON W JONES (HC)
1162 COURT ST NE
SALEM OR 97301-4096
jason.w.jones@state.or.us

W OREGON PUC STAFF
C ERIK COLVILLE (HC)
PO BOX 1088
SALEM OR 97308-1088
erik.colville@state.or.us

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G. C. M.', written in a cursive style.

G. Catriona McCracken, Attorney #933587
General Counsel/Regulatory Program Dir.
Citizens' Utility Board of Oregon
610 SW Broadway, Ste. 400
Portland, OR 97205
(503) 227-1984 phone
(503) 274-2596 fax
Catriona@oregoncub.org