BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 266

In the Matter of	)
	)
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL	)
	)
Investigation into Schedule H, Large Volume Non-Residential High Pressure Gas Service Rider	)

OPENING TESTIMONY

OF THE

CITIZENS' UTILITY BOARD OF OREGON

November 27, 2013

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 266

In the Matter of NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL Investigation into Schedule H, Large Volume Non-Residential High Pressure Gas Service Rider	OPENING TESTIMONY OF THE CITIZENS' UTILITY BOARD OF OREGON

My name is Bob Jenks, and my qualifications are listed in CUB Exhibit 101.

I. Introduction

NW Natural proposes to provide High Pressure Gas Service (HPGS) through the addition of its proposed Schedule H, Large Volume Non-Residential High Pressure Gas Service Rider, to its Schedules 3, 31 and 32 non-residential natural gas service schedules.

From the outset, CUB was generally supportive of the Company's proposal to provide HPGS to customers, so long as the Company was able to demonstrate a long-term net benefit to existing customers and ensure that there would be no cross-subsidization from existing customer classes. As CUB analyzed the Company's proposal, CUB was unable to determine whether the proposed HPGS provided a net benefit to customers and saw clear evidence of long-term subsidization from existing customers.[1]

Because of the apparent cross-subsidization issues and the Company's failure to demonstrate a long-term net benefit to existing customers, CUB was unable to support NW Natural's Advice 13-10 as filed. CUB voiced its concerns in its September 30, 2013 written Comments on NW Natural Advice 13-10 and then again orally at the October 28, 2013 public meeting.[2]

Subsequent to the public meeting, and after discussions with CUB, the Company filed testimony in which it removed the proposed subsidies related to customer service and the feasibility study.

Without those subsidies, the service provides a net benefit to the system through the sharing of fixed costs,[3] as gas is sold under the service. The Company now proposes to recover all project development and administrative costs from customers via an Administrative Services Charge and a Monthly Facilities Charge.[4] Additionally, the Company agrees to "track staff time spent on [administrative] services for the first year, meet with stakeholders to discuss the costs, and propose changes to the tariff in order to adjust the Administrative Services charge as necessary"[5] and "to conform to Staff's recommendation that [the Company] identify and record all first-time costs of developing

---

[1] See CUB Exhibit 102. In its response to CUB Data Request 18, the Company conceded that "costs during phase one which include customer service and a feasibility study would be incurred through the labor of employees whose costs are recovered in general rates." In its response to CUB Data Request 28, the Company also stated that "[l]egal costs and business development costs for program design and implementation are being paid for by customers…to the extent determined in NW Natural's last rate case."

[2] *See* UG 266 NWN/201/Summers/18-19.

[3] UG 266 NWN/100/Thompson/7-8.

[4] UG 266 NWN/200/Summers/14-20; UG 266 NWN/202/Summers/1.

[5] UG 266 NWN/200/Summers/19, lines 21-24.

the HPGS service proposal, including legal costs of drafting contracts, general pricing review, and market research" to be included in the Monthly Facility Charge in Schedule H.

Since current rates do not reflect the costs of this service, including the increased customer service costs and the cost of site evaluations, current customers are not subsidizing these costs. By agreeing to track these costs, and to adjust the Administrative Service charge if it is not recovering these costs, other customers are protected from subsidizing the service. Without a subsidy, the increased sales will contribute to the fixed costs of the system and provide a net benefit to other customers.

In light of the proposals and commitments made by the Company in its November 18, 2013 testimony in this docket, CUB is supportive of Commission approval of NW Natural Advice 13-10.[6] However, while CUB is supportive of the Company's proposed Schedule H, CUB does not agree that the standard to be applied by the Commission in this case is the "no harm" standard, as advocated for by NW Natural.[7] Rather, the appropriate standard for the Commission to apply is the "net benefit" standard, which is consistent with the extension of gas service, generally, and with prior Commission precedent for utility-owned alternative fuel infrastructure.

II. The Net Benefit Standard

NW Natural argues that, despite its ability to demonstrate that its proposed Schedule H meets the "net benefit" standard, in its opinion the "correct standard to apply

[6] CUB is only able to support the Company's filing in this case because CUB has determined that it meets the "net benefit" standard. CUB has made this determination notwithstanding that the Company advocates for a "no harm" standard.
[7] UG 266 NWN/100/Thompson/7, lines 7-15.

is the 'no harm' standard."[8] CUB does not agree. In CUB's opinion the correct standard is the "net benefit" standard.

A. The Net Benefit Standard

Natural gas service is not an essential service—customers always have the ability to consume another energy source to satisfy their energy demands.[9] Accordingly, natural gas utilities have an obligation to extend service *only if the expected revenues from new customers cover the incremental costs and make a contribution to system costs*, thus providing a net benefit to the utility's other ratepayers.[10]

Much of a utility system is made up of items that have fixed costs. The cost of the existing distribution system is sunk. It represents an investment that has already been made. It is not an avoidable cost. In addition, significant amounts of O&M costs and A&G costs (such as pension management, CEO and Board of Directors compensation), may not be considered sunk costs, but do not vary with the addition of additional gas sales or services. But these costs are built into the price of natural gas. Because of this, new customers and/or new sales will provide a net benefit if they fully cover the additional costs related to the additional sales. The math is wonderfully simple. By spreading out a set of costs (that do not increase with additional sales) over a larger

---

[8] UG 266 NWN/100/Thompson/7, line 10.

[9] NRRI Line Extensions for Natural Gas:Regulatory Considerations. "In most states, electric utilities have assigned and exclusive service territories, as well as an obligation to serve. Natural gas lacks this essential nature, as other energy sources are able to provide all the end-use services that natural gas does." Executive Summary at p. vi; "One fundamental difference to note with electricity is that gas service is not as essential because customers can always consume some other energy source (e.g., oil or propane) to satisfy their end-use demands. We should expect regulators to more willingly mandate service extensions by electric utilities. Most states, in fact, have a statutory universal service goal or mandate for electric service, but not for natural gas. Id. at p. 18.

[10] UG 266 CUB's September 30, 2013 written Comments at 2 related to the NW Natural Advice Filing 13-10.

volume of sales, the amount of fixed costs that are recovered per unit of sales is reduced. Other customers who are purchasing gas benefit because each of them is required to contribute less to the fixed costs of the system.

In the case where a new service will introduce new sales, a net benefit does not require additional subsidies. If a new service is offered that will increase sales, a net benefit is obtained when subsidies are eliminated. CUB's position is not that high pressure gas service as a transportation fuel must be priced at a level that subsidizes service to anyone else. CUB's position is that all customers will benefit, if that service is priced at a level that fully recovers its costs and makes a contribution to the shared system costs that do not vary with the new service.

A no harm standard, on the other hand, would simply require that the service recover all of its incremental costs, but not that it make any contribution to the fixed costs of its system. Other customers' rates would be the same under this circumstance as they would be without the new service, so there would be no financial harm on other customers. But this creates an unfair subsidy. The new service is using the distribution system that is made up of fixed costs. The new service has required time from upper management and the Board of Directors. While other customers may not be paying higher rates than without the new service, they are unfairly subsidizing the new service by paying the fixed costs associated with that service.

The fair outcome, the outcome that does not require any subsidies, is to require that the new service be priced at a level that pays for its incremental cost and makes a contribution to the shared fixed costs of the system. This is a net benefit.

It is important to recognize that the net benefit standard CUB is applying here is not based on a specific test year, but is based on looking at what the new service will provide over a number of years. During the first year, other customers' rates will stay the same as they were before the service and it is only over time, as the rates are reset and the load forecast includes new sales, that the contribution to fixed costs from the new sales will provide a benefit to customers. But if the subsidies are eliminated and there are additional sales, there will be a net benefit.

B. Commission Precedent Makes Clear that HPGS Must Meet a Net Benefit Standard

i. Existing Line Extension Policy.

As discussed in CUB's September 30, 2013 comments, NW Natural's own line extension policy, contained in Schedule X, serves as an example of the net benefit principle. Specifically, Schedule X requires new customers to assume financial responsibility for costs associated with extending service if those costs are greater than the benefits the service will provide to other ratepayers. The allowable costs for extending service are based upon the "construction allowance," which differs between residential and non-residential developments.[11] For residential developments, the construction allowance is based on the type and number of gas-fired appliances to be installed to ensure that the customer's gas usage will be great enough to provide a benefit to the system. Customers without gas heating or gas water heating have a low construction allowance because they will provide little revenues to the system, whereas customers with gas heating have a higher construction allowance because they will

[11] NW Natural Schedule X at X-5.

provide greater revenue to the system. In both cases, the expectation is that the customers will provide net margin revenues within five years and therefore provide a net benefit to the system. For non-residential projects, the construction allowance is based upon the estimated annual margin revenue; the purpose is to estimate the cost of extending service and to ensure that for non-residential projects, customers begin to contribute to the shared fixed costs of the distribution system at year six, thereby benefitting all ratepayers.

Clearly, NW Natural's own Schedule X requires a net benefit, rather than simply meeting a "no harm" standard. If a net benefit must be met in order to extend natural gas service in all other circumstances, there is no legal or policy reason that HPGS should be an exception. The Commission has consistently imposed a net benefit standard for the extension of natural gas service,[12] and should do so again in this case.

Additionally, in the case of fuel switching, the customer's overarching interest is in lowering his or her energy (or in this case, fuel) cost—not in acquiring new energy services. This serves to underscore the fact that a net benefit is required for HPGS in this case as no public need is being served by the extension of HPGS to customers who want the service even though there are clear economic and environmental benefits.[13] But this is not unique to transportation fuels. There is no reason to treat this differently than when a homeowner is requesting service for conversion from heating oil. While there are clear environmental and economic benefits to that switch, the line extension policies require a net benefit for that service.

[12] For example, see the discussion below related to when NW Natural sought to extend natural gas service to Coos County. OPUC Order No. 03-236.
[13] UG 266 NWN/200/Summers/8, line 19 to 9, line 1.

ii. Electric Vehicle Charging.

The Commission has already applied the net benefit standard to alternative fueling infrastructure. In docket UM 1461, *Investigation of Matters Related to Electric Vehicle Charging, the Commission explicitly* stated that prudence, in the context of EVSE, requires the utility to demonstrate a net benefit to customers:

> We expect a utility that requests rate recovery for EVSE investment to make a *compelling* case that the utility's ownership and operation of the EVSE is beneficial to ratepayers—not just the public generally. Utilities suggest that prudence be the primary measure used to determine whether EVSE investment should be recoverable in rates. We respond that prudence, in the context of EVSE investment, requires a showing of net benefits to customers.[14] We find, therefore, that Staff's first criterion is fundamental to the analysis. We note, however, that a showing that utility EVSE investment has net benefits to customers may be dependent on a showing of Staff's other criteria, such as the necessity of installing and operating charging infrastructure at the particular location to facilitate plug-in EV adoption in the greater area, and the lack of a third party EVSP or utility affiliate to provide the same services at the location or a nearby location.[15]

The Staff criteria referred to by the Commission were:

> 1. The utility's cost (investment and operating) in charging stations must meet the same net benefit test as other utility investments.
>
> Staff indicates that utility EVSE costs should be evaluated within the Commission's traditional regulatory measures of service quality, the fairness and reasonableness of rates, and the prevention of undue cost shifting. Staff observes that the net benefit analysis will vary depending upon whether a utility seeks to recover costs from the EV class alone, or from all ratepayers. In order to justify general rate recovery, Staff states that a utility would have to demonstrate net benefits provided to all ratepayers. Staff explains, "[fJor example, the utility might show that investments in public charging will help implement demand response or achieve better utilization of existing fixed assets." (sic)
> would also need to show that the benefits could only be provided by the utility and not another party-e.g., a utility affiliate or a third party EVSP.

[14] OPUC Order No. 12-013 at 10 (emphasis in original).
[15] OPUC Order No. 12-013 at 10 (emphasis in original).

> 2. Charging infrastructure is essential at the location to facilitate plug-in EV adoption in the area.
>
> Staff suggests that the Commission should consider factors such as: (a) whether the proposed location is on an important travel corridor that requires adequate charging; (b) the proposed location would fill a gap on a corridor that could not be adequately served by private charging stations; and (c) utility service at the proposed location would enable private charging stations to competitively serve other locations on the corridor.
>
> 3. There is no likelihood that a third party EVSP or utility affiliate could provide the same services at the location or a nearby location.
>
> Staff suggests that solicitation of third party bids should always precede utility investment.
>
> 4. The utility has a separate EV rate class.[16]

As CUB stated in its September 30, 2013 comments on NW Natural Advice 13-10, there is no meaningful difference between electric charging stations and HPGS in the context of rate recovery for proposed infrastructure. The issues, including whether utility ownership is appropriate, concerns about competitive markets, and concerns about ratepayer costs and risks, are strikingly similar. There is no compelling legal or policy basis to require utility-owned HPGS infrastructure to meet a lower standard than EVSE infrastructure.

iii. Coos County Service.

The Commission affirmed a net benefit standard when NW Natural sought to extend natural gas service to Coos County. Prior to constructing a distribution system in Coos County, the Company conducted a market study to gauge demand and ultimately concluded that there was a "shortfall in the revenues necessary to provide an adequate

[16] OPUC Order No. 12-013 at 8 (citations omitted).

rate of return on the construction of a distribution system in Coos County. NW Natural initially decided not to construct the system unless the shortfall could be recovered from its customers, in part from its current residential and commercial customers. NW Natural's proposal met opposition from CUB and Staff because of the burden it placed on statewide residential and commercial customers. The parties ultimately settled, with agreement that NW Natural would recover the revenue shortfall through Schedule 160, which placed the burden of recovery on Coos County customers, rather than customers state-wide. In addition to paying for the cost of the infrastructure required, customers are contributing to system costs via the volumetric charges on their bills, thereby creating a long-term net benefit to the system[17].

iv. NW Natural's "no harm" citations are inapplicable to the facts of this case.

On NWN/100 Thompson/7 at fn. 17, NW Natural provides a string cite to prior Commission Orders in an attempt to show that the "no harm" standard is the standard that should be applied to this docket. NW Natural is incorrect for the following reasons.

First, NW Natural cites to telecom mergers where a different standard is applied because the matter involves a merger and because the matter relates to telecom. The facts in this HPNG case obviously have nothing to do with either telecom or mergers.

> "This standard has been recently applied in both the CenturyTel/Embarq merger, Order No. 09-169 in Docket UM 1416 and the acquisition of Verizon Northwest by Frontier Corporation, Order No. 10-067 in Docket UM 1431, each citing Order No. 95-526 involving a transaction under ORS 759.375(1)(c) and ORS 759.380. ***This is a lesser standard than the "net benefits" test employed under ORS 757.511 for energy utility acquisitions.*** See also Order No. 08-617, Docket UP 249 and Order No. 02-466, Docket UP 195." [18]

[17] OPUC Order No. 03-236.

[18] Order 11-095 at 6 fn. 12 ***(emphasis added).***

Second, NW Natural cites to utility asset purchase and sale dockets where a different standard is applied. This HPNG docket has nothing to do with utility asset purchase and sale contracts:

> "Public Interest Compliance
>
> The Commission customarily applies a no harm standard with regard to the public interest compliance of property sales. This sale reverses a recent purchase of property by PGE that, unbeknownst to PGE, had not been duly authorized by the City Council. There is no loss on the sale, and customers are not harmed by this transaction; therefore, Staff concludes that the sale is in the public interest."[19]

Third, NW Natural cites to utility finance dockets where the "no harm" standard is applicable.[20] This HPGN docket has nothing to do with letters of credit and other utility financing.

> "No Harm: A larger cap on Idaho Power's guarantee for its share of Bridger Coal reclamation will *do* no harm, and can be expected to benefit ratepayers through continued control of cost and risk."[21]
>
> * * * *
>
> "Staff's review of NW Natural's Application finds the terms reasonable and beneficial to ratepayers. The Company represents that funds obtained under this replacement Credit Agreement will be used solely for lawful utility purposes. The Company demonstrated in a phone workshop on January 10, 2013, and through the submission of supplemental materials via email on that date and on January 16, 2013, that provisions of the new Credit Agreement will do no harm, and will continue to allow NW Natural flexibility to negotiate favorable market fees and expenses."[22]

---

[19] OPUC Order No. 13-372 at 3.

[20] CUB notes that one of the utility finance dockets referred to was UF 4000, a 1988 order where the no harm standard was applied in an electric utility merger. Notwithstanding the standard applied in the UF 4000 order, if a close examination of the order is conducted, it is revealed that the Commission included the statement, "[a]s explained below, the record in this case demonstrates that the proposed merger and related transactions will yield significant net benefits to Pacific's Oregon ratepayers and the public generally." Also noteworthy, however, is the fact that the Commission's thinking, on the issue of gas and electric utility mergers, has evolved since that the UF 4000 order was issued and now requires that gas and electric utilities seeking to merge meet a net benefit standard. Order No. 01-778 (In the Matter of a Legal Standard for Approval of Mergers Docket UM 1011, Sept. 2001). CUB acknowledges that the clarifying order (Order No. 01-778) expressed the legal requirement for a "net benefit standard" which was not the preferred standard by the Commissioner's of the day.

[21] OPUC Order 13-269 at 5.

Telecommunication mergers, gas and electric asset sales and gas and electric purchases and financing events are one time only events, not ongoing service. Customers subject to those kinds of one-time events are generally protected if there is a no harm standard.

But on-going utility sales to customers are different. Either the ongoing sales are at a price that contributes to fixed costs and provide a net benefit to the system or the sales are not priced sufficiently to contribute to fixed costs and other customers are unfairly asked to pick up the share of the fixed costs that are being used to serve the customer. This is the kind of activity that is the subject of this docket and thus requires application of the net benefit standard.

III. Conclusion.

CUB recommends that the Commission approve the proposed Schedule H, Large Volume Non-Residential High Pressure Gas Service Rider, to its Schedules 3, 31 and 32 non-residential natural gas service schedules. By eliminating subsidies to this service, the Large Volume Non-Residential High Pressure Gas Service Rider will be offered in a manner that provides a net benefit to customers.

In addition, CUB urges the Commission to reaffirm that new gas services should be priced in a manner that ensures that the service covers it costs, and makes a contribution to fixed costs, thus creating a net benefit for other customers.

[22] OPUC 13-069 at 6.

WITNESS QUALIFICATION STATEMENT

NAME: Bob Jenks

EMPLOYER: Citizens' Utility Board of Oregon

TITLE: Executive Director

ADDRESS: 610 SW Broadway, Suite 400
Portland, OR 97205

EDUCATION: Bachelor of Science, Economics
Willamette University, Salem, OR

EXPERIENCE: Provided testimony or comments in a variety of OPUC dockets, including UE 88, UE 92, UM 903, UM 918, UE 102, UP 168, UT 125, UT 141, UE 115, UE 116, UE 137, UE 139, UE 161, UE 165, UE 167, UE 170, UE 172, UE 173, UE 207, UE 208, UE 210, UG 152, UM 995, UM 1050, UM 1071, UM 1147, UM 1121, UM 1206, UM 1209, UM 1355, UM 1635, UE 233, and UE 246. Participated in the development of a variety of Least Cost Plans and PUC Settlement Conferences. Provided testimony to Oregon Legislative Committees on consumer issues relating to energy and telecommunications. Lobbied the Oregon Congressional delegation on behalf of CUB and the National Association of State Utility Consumer Advocates.

Between 1982 and 1991, worked for the Oregon State Public Interest Research Group, the Massachusetts Public Interest Research Group, and the Fund for Public Interest Research on a variety of public policy issues.

MEMBERSHIP: National Association of State Utility Consumer Advocates
Board of Directors, OSPIRG Citizen Lobby
Telecommunications Policy Committee, Consumer Federation of America
Electricity Policy Committee, Consumer Federation of America

Data Request No. 18

At the workshop on July 26, 2013, NW Natural stated that marketing costs and feasibility costs are spread to all customers and not just contractors for HPGS service. Please explain.

NW Natural Response

NW Natural intended to communicate that the costs during phase one which include customer service and a feasibility study would be incurred through the labor of employees whose costs are recovered in general rates. The Company believes this is appropriate because the customer will also be either a new gas customer or will be an existing gas customer adding a new service line for HPGS service. The work the Company will perform to establish service for this customer and to install the service line and determine if the feasibility of that customer using CNG is the same work it would perform for a customer putting in a service line to its own or a third party's compression facilities.

NW Natural notes that all customers taking HPGS will also be taking service under another general rate schedule from NW Natural. With respect to marketing costs, NW Natural assumes the same rules about cost recovery for marketing will apply in this case as apply generally to NW Natural's marketing costs, which are reviewed and set in a rate case.

Data Request No. 28

Who will pay for the legal fees related to design, implementation, and enforcement of the contracts? Who is paying for legal fees and staff time related to the workshops currently being conducted in regard to the implementation of HPGS?

NW Natural Response

Legal costs and business development costs for program design and implementation are being paid for by customers only to the extent determined in NW Natural's last rate case. Thus, the Company is bearing any differences in actual costs incurred in the workshops and other efforts referred to above. NW Natural expects that this will be the case going forward as well. Also please note that a level of O&M related to an LRIC study from a prior rate case proceeding is included in the scheduled maintenance charge. This revenue recovery is intended to offset administrative costs related to the service, including legal contract work, accounting, program oversight, etc.

UG 266 – CERTIFICATE OF SERVICE

I hereby certify that, on this 27th day of November, 2013, I served the foregoing **OPENING TESTIMONY OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UG 266 upon each party listed in the UG 266 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 C
OREGON DEPARTMENT OF ENERGY
JULIE PEACOCK
625 MARION ST NE
SALEM OR 97301-3737
julie.peacock@state.or.us

W C
OREGON DEPARTMENT OF ENERGY
KACIA BROCKMAN
625 MARION ST NE
SALEM OR 97301-3737
kacia.brockman@state.or.us

W C
OREGON DOJ
RENEE M FRANCE
1162 COURT ST NE
SALEM OR 97301-4096
renee.m.france@doj.state.or.us

W C
ALCANTAR & KAHL
KATY ROSENBERG
33 NEW MONTGOMERY ST
STE 1850
SAN FRANCISCO CA 94105
klr@a-klaw.com

W C
ALCANTAR & KAHL
EVELYN KAHL
33 NEW MONTGOMERY ST
STE 1850
SAN FRANCISCO CA 94105
ek@a-klaw.com

W
ALCANTAR & KAHL
DONALD E BROOKHYSER
1300 SW FIFTH AVE SW
STE 1750
PORTLAND OR 97201
deb@a-klaw.com

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

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

W C
NORTHWEST NATURAL
JENNIFER GROSS
220 NW 2ND AVENUE
PORTLAND OR 97209
jennifer.gross@nwnatural.com

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

W **PUC STAFF—DOJ**
C STEPHANIE S ANDRUS
1162 COURT ST NE
SALEM OR 97301-4096
stephanie.andrus@state.or.us

W **TRANSFUELS LLC, DBA BLU.**
PATRICK BELNAP
3760 COMMONS LANE
SALT LAKE CITY UT 84104
patrick.belnap@blulng.com

W **TRANSFUELS LLC, DBA BLU.**
ZACHARY WESTER
3760 COMMONS LN
SALT LAKE CITY UT 84104
zachary.wester@blulng.com

W **NORTHWEST NATURAL**
C KELLEY MILLER
220 NW 2ND AVE
PORTLAND OR 97209
kelley.miller@nwnatural.com

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

W **TRANSFUELS LLC, DBA BLU.**
JON WADSWORTH
3760 COMMONS LANE
SALT LAKE CITY UT 84104
jon.wadsworth@blulng.com

W **TRUSTAR ENERGY LLC**
MICHAEL TUCKER
7970 CHERRY AVE #301
FONTANA CA 92336
mtucker@trustarenergy.com

Respectfully submitted,

G. Catriona McCracken, Attorney #93358
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