



CHAD M. STOKES

cstokes@cablehuston.com
cablehuston.com

October 15, 2018

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High St SE, Suite 100
Salem, Oregon 97301

RE: LC 71 – Alliance of Western Energy Consumers’ Comments

Dear Filing Center:

Alliance of Western Energy Consumers (“AWEC”) appreciates the opportunity to comment on Northwest Natural Gas Company’s dba NW Natural 2018 Integrated Resources Plan (“IRP”). On Tuesday, October 9, 2018, there was a major disruption of gas supplies in the region because the 36-inch pipeline owned and operated by Enbridge subsidiary West Coast Energy (“West Coast”) ruptured. As a precaution, West Coast also shut down its 30-inch line, meaning that both pipelines serving the Sumas-Huntingdon (“Sumas”) delivery point were depressurized. AWEC is not aware of any other time the Williams-NW Pipeline system has run without deliveries at Sumas. Fortunately, no one was injured from the rupture, though many people were evacuated.

With little notice, service to many industrial customers was interrupted to conserve gas supplies for the region. It is important to note that the magnitude of the disruption would have been significantly greater had this happened in winter, when it would not have been possible to take all the region’s natural gas fired electric generation offline.

AWEC urges NW Natural to supplement the 2018 IRP with a special analysis of how the system performed during the days immediately following the rupture and loss of service from Sumas. The analysis should include an in-depth analysis of how curtailments of industrial loads kept NW Natural’s system from losing pressure or having to interrupt core customers. The analysis should also include a scenario where this type of event happened in winter, where it would not have been possible to interrupt natural gas fired electric generation, including the effect on both gas and electric service.

CABLE HUSTON

October 15, 2018

Page 2

AWEC reserves the right to respond to issues raised in other parties' comments and reserves all rights to participate in full as a party throughout this docket. Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Chad M. Stokes