

VIA ELECTRONIC FILING

August 12, 2021

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

RE: LC 71 - NW Natural's Third 2018 IRP Update: Comments on Staff's Final Report

Northwest Natural Gas Company, dba NW Natural (NW Natural or the Company), provides these comments in the above-referenced docket in response to Public Utility Commission of Oregon Staff's (Staff) request for participant comments on its Final Report to NW Natural's third update to its 2018 Integrated Resource Plan (IRP).

NW Natural would like to take this opportunity to thank all participants in its IRP process for their engagement, comments, and general spirit of collaboration, particularly stakeholders' thoughtful review of the third update to the 2018 IRP (Update) and willingness to entertain action items through this process. NW Natural would like to reiterate the two action items for which the Company is seeking acknowledgement in this update are projects that are required to reliably and safely serve existing customer needs and are actions that support providing utility service in a least cost, least risk manner. With this, NW Natural supports Staff's recommendation for the Commission to acknowledge the Cold Box replacement project at the Newport LNG peak storage facility and upgrading the North Coast Feeder to ensure reliable service for NW Natural's customers on the Oregon Coast.

With regard to avoided costs, NW Natural engaged stakeholders in detail on this issue in workshops in advance of filing this Update on March 1, 2021, and believes the Company has provided the data and support for its updated values in the Update and subsequent data requests to support a thorough review by Staff and other interested parties. With this, the Company believes it appropriate for the Commission to acknowledge these updated values in support of acquiring all cost-effective energy efficiency and emissions reduction opportunities. NW Natural understands Staff's desire to better understand these values and will continue to engage Staff and other stakeholders regarding avoided costs. To that end, in early August NW Natural coordinated with Staff about how best to convene an additional workshop related to the Company's updated distribution system capacity cost and risk reduction value avoided cost values per Staff's request in its Final Report.

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NW Natural again thanks Staff for this opportunity and will comply with any other conditions noted in the final Commission Order.

Sincerely,

/s/ Rebecca T. Brown

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cc: Bob Jenks, CUB
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