OF OREGON

UG 435

In the Matter of) COALITION'S MOTION TO) ADMIT PRE-FILED TESTIMONY
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,) AND EXHIBITS
Request for a General Rate Revision.)
))

Intervenors Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (the "Coalition") respectfully moves for the admission the following pre-filed testimony and exhibits into the record as evidence in this proceeding. Parties have waived cross-examination and stipulated to admission of certain exhibits into the record, including exhibits referenced below.

- 1. Coalition's Opening Testimony and Exhibits filed on April 22, 2022, marked Coalition/100 through Coalition/408:
 - a. Coalition/100: Opening testimony of Nora Apter
 excluding withdrawn portions at Coalition/100, Apter/20–24, regarding NW
 Natural compliance with CPP
 - b. Coalition/101: Qualification statement of Nora Apter
 - c. Coalition/102: Resume of Nora Apter
 - d. Coalition/103: Exhibit NW Natural Response to OPUC Data Request 311
 - e. Coalition/104: Exhibit NW Natural Response to CUB Data Request 37
 - f. Coalition/200: Opening testimony of Ed Burgess

- g. Coalition/201: Qualification statement of Ed Burgess
- h. Coalition/202: Resume of Ed Burgess
- i. Coalition/203: Exhibit RMI Reports, Cost of All Electric Single-Family
 Homes in Austin, Boston, Columbus, Denver, Minneapolis, New York City,
 and Seattle
- j. Coalition/204: Exhibit Natural Gas Fact Finding Draft Report in UM 2178
- k. Coalition/205: Exhibit RMI Report, Overextended: It's Time to Rethink
 Subsidized Gas Line Extensions, December 2021
- 1. Coalition/206: Exhibit NW Natural Response to Coalition Data Request 24
- m. Coalition/207: Exhibit NW Natural Response to Coalition Data Request 90
- n. Coalition/208: Exhibit NW Natural Response to Coalition Data Request 91
- o. Coalition/209: Exhibit NW Natural Response to Coalition Data Request 99
- p. Coalition/210: Exhibit NW Natural Response to Coalition Data Request 100
- q. Coalition/211: Exhibit NW Natural Response to Coalition Data Request 102
- r. Coalition/212: Exhibit NW Natural Response to Coalition Data Request 52,
 Attachment 1
- s. Coalition/213: Exhibit NW Natural Response to Coalition Data Request 52
- t. **Coalition/300**: Opening testimony of Charity Fain, including errata to pages Fain/3–4 filed on May 20, 2022
- u. Coalition/301: Qualification statement of Charity Fain
- v. Coalition/302: Resume of Charity Fain
- w. Coalition/303: Exhibit NW Natural Response to Coalition Data Request 48,
 Attachment 1

- x. Coalition/400: Opening testimony of Greer Ryan
- y. Coalition/401: Qualification statement and resume of Greer Ryan
- z. Coalition/402: Combined Exhibit Fuel Switch
- aa. Coalition/403: Combined Exhibit Gas Use
- bb. Coalition/404: Combined Exhibit Indoor Air Quality
- cc. Coalition/405: Combined Exhibit RNG
- dd. Coalition/406: Combined Exhibit Safety
- ee. Coalition/407: Combined Exhibit Other Documents
- ff. Coalition/408: Combined Exhibit Lobbying

2. Coalition's Rebuttal and Cross-Answering Testimony filed on June 30, 2022, marked Coalition/500 through Coalition/935:

- a. Coalition/500: Rebuttal and cross-answering testimony of Ed Burgess
- b. Coalition/600: Rebuttal and cross-answering testimony of Nora Apter
- c. Coalition/700: Rebuttal and cross-answering testimony of Brian Stewart
- d. Coalition/701: Qualification statement of Brian Stewart
- e. Coalition/702: Resume of Brian Stewart
- f. Coalition/703: Exhibit Synapse Report, Toward Net Zero Emissions from Oregon Buildings, June 23, 2022
- g. Coalition/704: Exhibit RMI Report, Economic and Energy Analysis of Building Electrification in Eugene, April 7, 2022
- h. Coalition/705: Exhibit NRDC comments, price comparison of heat pumps
 vs. gas furnace and AC systems, November 12, 2020

- i. Coalition/706: Exhibit NEEA Report, Residential Building Stock
 Assessment for Single-Family Homes 2016–2017
- j. Coalition/707: Exhibit NEEA Report, Residential Building Stock
 Assessment for Multifamily Buildings 2016–2017
- k. Coalition/708: NRDC Comments, draft environmental impact report for 2022
 building standards
- l. Coalition/800: Rebuttal testimony of Charity Fain
- m. Coalition/900: CONFIDENTIAL Rebuttal and Cross-Answering Testimony of Greer Ryan Objecting to the Stipulated Settlement
- n. Coalition/901: Exhibit NW Natural Response to OPUC Staff Data Request
 57, Attachment 1, Affiliated Media excerpt
- o. Coalition/902: Exhibit NW Natural Response to Coalition Data Request 165
- p. Coalition/903: Exhibit NW Natural Response to Coalition Data Request 172
- q. Coalition/904: Exhibit NW Natural Response to Coalition Data Request 173
 (Redacted)
- r. Coalition/905: Exhibit NW Natural Response to Coalition Data Request 174
 (Redacted)
- s. Coalition/906: Exhibit NW Natural Response to Coalition Data Request 175 (Redacted)
- t. Coalition/907: Exhibit NW Natural Response to Coalition Data Request 191
- u. Coalition/908: Exhibit NW Natural Response to CUB Data Request 5,
 Attachment 1

- v. Coalition/909: Exhibit NWN Response to OPUC Staff Data Request 257,
 Attachment 1
- w. Coalition/910: Exhibit Singer, et al., Pollutant Concentrations and Emissions
 Rates from Natural Gas Cooking Burners Without and With Range Hood
 Exhaust in Nine California Homes, 2017
- x. Coalition/911: Exhibit NW Natural 2021 paid search and display ads, indoor air quality campaign
- y. Coalition/912: Exhibit AMA Reference Committee Report
- z. Coalition/913: Exhibit NW Natural bill insert, March 2021
- aa. Coalition/914: Exhibit NW Natural Response to Coalition Data Request 47
- bb. Coalition/915: Exhibit NW Natural Response to Coalition Data Request 53
- cc. Coalition/916: Exhibit NW Natural Response to Coalition Data Request 57,

 Attachment 1
- dd. Coalition/917: Exhibit NW Natural Response to Coalition Data Request 57
- ee. Coalition/918: Exhibit NW Natural Response to Coalition Data Request 202
- ff. Coalition/919: Exhibit NW Natural Response to Coalition Data Request 203
- gg. Coalition/920: Exhibit June 25, 2022, email from NW Natural Public

 Affairs Team re political advertising
- hh. Coalition/921: Exhibit April 3, 2022, NW Natural advertisement
- ii. Coalition/922: Exhibit Public records obtained from Multnomah County
- ij. Coalition/923: Exhibit Public records obtained from City of Portland
- kk. Coalition/924: Exhibit Public records obtained from City of Eugene
- 11. Coalition/925: Exhibit Public records obtained from City of Milwaukie

- mm. Coalition/926: Exhibit NW Natural Response to Coalition Data

 Request 78
- nn. Coalition/927: Exhibit NW Natural Response to Coalition Data Request 146, Attachment 2
- oo. Coalition/928: Exhibit NW Natural Response to Coalition Data Request 151, Attachment 2
- pp. Coalition/929: Exhibit NW Natural Response to Coalition Data Request 151, Attachment 3
- qq. Coalition/930: Exhibit NW Natural Response to Coalition Data Request 209
- rr. Coalition/931: CONFIDENTIAL Exhibit NW Natural Response to

 Coalition Data Request 11, Attachment 1
- ss. Coalition/932: CONFIDENTIAL Exhibit NW Natural Response to Coalition Data Request 208, Attachment 1
- tt. Coalition/933: CONFIDENTIAL Exhibit NW Natural Response to Coalition Data Request 208, Attachment 2
- uu. Coalition/934: CONFIDENTIAL Exhibit NW Natural Response to
 Coalition Data Request 104, Attachment 1
- vv. Coalition/935: CONFIDENTIAL Exhibit NW Natural Response to Coalition Data Request 192
- 3. Stipulating Parties' Joint Testimony in Support of the Second Partial Stipulation filed on July 7, 2022, marked NW Natural-Staff-CUB-AWEC-Coalition/100

- 4. Coalition's Cross-Examination Exhibits filed on July 28, 2022, marked Coalition/1000 through Coalition/1003:
 - a. Coalition/1000: Exhibit NW Natural Response to Coalition Data
 Request 219
 - b. Coalition/1001: Exhibit NW Natural Response to Coalition Data
 Request 66
 - c. Coalition/1002: Exhibit NW Natural Response to Coalition DataRequest 67
 - d. Coalition/1003: Exhibit Excerpts of NW Natural Response to
 Coalition's Data Request 44, Attachment 1, NW Natural Investor
 Presentation dated September 2021

Dated this 23rd day of September, 2022.

Respectfully submitted,

/s/ Jaimini Parekh
Jaimini Parekh
Senior Attorney, WSBA No. 53722
(admitted pro hac vice)
Kristen L. Boyles
Managing Attorney, WBSA No. 23806
(admitted pro hac vice)
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/s/ Carra Sahler

Carra Sahler
Staff Attorney, OSB No. 024455
Green Energy Institute at Lewis & Clark Law School
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sahler@lclark.edu

OF OREGON

UG 435

In the Matter of) DECLARATION OF) NORA APTER
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,)
Request for a General Rate Revision.)))
)
)

- I, Nora Apter, do hereby declare and say:
 - My name is Nora Apter, and I am the Climate Program Director at Oregon
 Environmental Council. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 537 SE Ash Street Suites 205 & 206, Portland, OR 97214.
 - I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
 - 3. I sponsored the following testimony and exhibits:
 - a. Coalition's Opening Testimony of Nora Apter and Exhibits
 (Coalition/100 through Coalition/104)
 - Coalition/100: Opening testimony of Nora Apter
 excluding withdrawn portions at Coalition/100, Apter/20–24, regarding
 NW Natural compliance with CPP

2. Coalition/101: Qualification statement of Nora Apter

3. Coalition/102: Resume of Nora Apter

4. Coalition/103: Exhibit – NW Natural Response to OPUC Data Request

311

5. Coalition/104: Exhibit – NW Natural Response to CUB Data Request 37

b. Coalition/600: Rebuttal and cross-answering testimony of Nora Apter

The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 23rd day of September, 2022.

s/ Nora Apter
Nora Apter

OF OREGON

UG 435

In the Matter of) DECLARATION OF) ED BURGESS
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,)
Request for a General Rate Revision.)))
)

I, Ed Burgess, do hereby declare and say:

- My name is Ed Burgess, and I am a Senior Director at Strategen Consulting. I am
 appearing in this proceeding for Coalition of Communities of Color, Climate Solutions,
 Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy
 Project, and Sierra Club ("Coalition"). My business address is 10265 Rockingham Dr.,
 Suite #100-4061, Sacramento, CA 95827.
- I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
- 3. I sponsored the following testimony and exhibits:
 - a. Coalition's Opening Testimony of Ed Burgess and Exhibits
 (Coalition/200 through Coalition/213)
 - 1. Coalition/200: Opening testimony of Ed Burgess
 - 2. Coalition/201: Qualification statement of Ed Burgess
 - 3. Coalition/202: Resume of Ed Burgess

- Coalition/203: Exhibit RMI Reports, Cost of All Electric Single-Family Homes in Austin, Boston, Columbus, Denver, Minneapolis, New York City, and Seattle
- Coalition/204: Exhibit Natural Gas Fact Finding Draft Report in UM
 2178
- Coalition/205: Exhibit RMI Report, Overextended: It's Time to Rethink Subsidized Gas Line Extensions, December 2021
- Coalition/206: Exhibit NW Natural Response to Coalition Data
 Request 24
- Coalition/207: Exhibit NW Natural Response to Coalition Data
 Request 90
- Coalition/208: Exhibit NW Natural Response to Coalition Data
 Request 91
- Coalition/209: Exhibit NW Natural Response to Coalition Data
 Request 99
- Coalition/210: Exhibit NW Natural Response to Coalition Data
 Request 100
- Coalition/211: Exhibit NW Natural Response to Coalition Data
 Request 102
- 13. Coalition/212: Exhibit NW Natural Response to Coalition DataRequest 52, Attachment 1
- Coalition/213: Exhibit NW Natural Response to Coalition Data
 Request 52

b. Coalition/500: Rebuttal and cross-answering testimony of Ed Burgess

The above-referenced testimony and exhibits that were previously filed are true and

accurate based upon my information and belief. If I were to answer these same questions today,

my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge

and believe and that I understand my testimony will be used as evidence before the Public

Utilities Commission of Oregon.

Dated this 20th day of September, 2022.

Edward Burgar Ed Burgess

OF OREGON

UG 435

In the Matter of) DECLARATION OF) CHARITY FAIN
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,)
Request for a General Rate Revision.)))
)
)

- I, Charity Fain, do hereby declare and say:
 - My name is Charity Fain, and I am Executive Director of Community Energy Project. I
 am appearing in this proceeding for Coalition of Communities of Color, Climate
 Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community
 Energy Project, and Sierra Club ("Coalition"). My business address is 2705 Burnside
 Street, Suite 112, Portland, OR 97214.
 - I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
 - 3. I sponsored the following testimony and exhibits:
 - a. Coalition's Opening Testimony of Charity Fain and Exhibits
 (Coalition/300 through Coalition/303)
 - Coalition/300: Opening testimony of Charity Fain, including errata to pages Fain/3-4 filed on May 20, 2022
 - 2. Coalition/301: Qualification statement of Charity Fain

- 3. Coalition/302: Resume of Charity Fain
- Coalition/303: Exhibit NW Natural Response to Coalition Data
 Request 48, Attachment 1
- b. Coalition's Rebuttal Testimony of Charity Fain (Coalition/800)

In addition to the Coalition testimony referenced above, I also co-sponsored the following testimony:

- a. NW Natural, Staff, the Oregon Citizens' Utility Board, the Alliance of Western Energy Consumers, and The Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club's Joint Testimony in Support of Second Partial Stipulation of Zachary D. Kravitz, Robert Wyman, Brian Fjeldheim, Michelle Scala, Bob Jenks, Bradley Mullins, and Charity Fain (NW Natural-Staff-CUB-AWEC-Coalition/100).
- b. Stipulating Parties Reply Testimony to SBUAs Objections to the Second Stipulation by Zachary D. Kravitz, Robert Wyman, Brian Fjeldheim, Michelle Scala, Bob Jenks, Bradley Mullins, and Charity Fain (NW Natural-Staff-CUB-AWEC-Coalition/200).

The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public

Utilities Commission of Oregon.

Dated this 23rd day of September, 2022.

s/ Charity Fain

Charity Fain

OF OREGON

UG 435

In the Matter of) DECLARATION OF GREER RYAN
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,)))
Request for a General Rate Revision.)))
)
)

I, Greer Ryan, do hereby declare and say:

- My name is Greer Ryan, and I am the Clean Buildings Policy Manager at Climate
 Solutions. I am appearing in this proceeding for Coalition of Communities of Color,
 Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council,
 Community Energy Project, and Sierra Club ("Coalition"). My business address is 1300
 SE Stark Street, Suite 207 Portland, OR 97214.
- I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
- 3. I sponsored the following testimony and exhibits:
 - a. Coalition's Opening Testimony of Greer Ryan and Exhibits
 (Coalition/400 through Coalition/408)
 - 1. Coalition/400: Opening testimony of Greer Ryan
 - 2. Coalition/401: Qualification statement and resume of Greer Ryan
 - 3. Coalition/402: Combined Exhibit Fuel Switch

- 4. Coalition/403: Combined Exhibit Gas Use
- 5. Coalition/404: Combined Exhibit Indoor Air Quality
- 6. Coalition/405: Combined Exhibit RNG
- 7. Coalition/406: Combined Exhibit Safety
- 8. Coalition/407: Combined Exhibit Other Documents
- 9. Coalition/408: Combined Exhibit Lobbying
- b. Coalition's Rebuttal and Cross-Answering Testimony of Greer Ryan Objecting to the Stipulated Settlement and Exhibits (Coalition/900 through Coalition/935)
 - Coalition/900: CONFIDENTIAL Rebuttal and Cross-Answering
 Testimony of Greer Ryan Objecting to the Stipulated Settlement
 - Coalition/901: Exhibit NW Natural Response to OPUC Staff Data
 Request 57, Attachment 1, Affiliated Media excerpt
 - Coalition/902: Exhibit NW Natural Response to Coalition Data
 Request 165
 - Coalition/903: Exhibit NW Natural Response to Coalition Data
 Request 172
 - Coalition/904: Exhibit NW Natural Response to Coalition Data Request 173 (Redacted)
 - Coalition/905: Exhibit NW Natural Response to Coalition Data Request 174 (Redacted)
 - Coalition/906: Exhibit NW Natural Response to Coalition Data
 Request 175 (Redacted)

- Coalition/907: Exhibit NW Natural Response to Coalition Data
 Request 191
- Coalition/908: Exhibit NW Natural Response to CUB Data Request 5,
 Attachment 1
- Coalition/909: Exhibit NWN Response to OPUC Staff Data Request
 Attachment 1
- 11. Coalition/910: Exhibit Singer, et al., Pollutant Concentrations and Emissions Rates from Natural Gas Cooking Burners Without and With Range Hood Exhaust in Nine California Homes, 2017
- 12. Coalition/911: Exhibit NW Natural 2021 paid search and display ads, indoor air quality campaign
- 13. Coalition/912: Exhibit AMA Reference Committee Report
- 14. Coalition/913: Exhibit NW Natural bill insert, March 2021
- Coalition/914: Exhibit NW Natural Response to Coalition Data
 Request 47
- Coalition/915: Exhibit NW Natural Response to Coalition Data
 Request 53
- 17. Coalition/916: Exhibit NW Natural Response to Coalition DataRequest 57, Attachment 1
- Coalition/917: Exhibit NW Natural Response to Coalition Data
 Request 57
- Coalition/918: Exhibit NW Natural Response to Coalition Data
 Request 202

- 20. Coalition/919: Exhibit NW Natural Response to Coalition Data Request 203
- 21. Coalition/920: Exhibit June 25, 2022, email from NW Natural Public

 Affairs Team re political advertising
- 22. Coalition/921: Exhibit April 3, 2022, NW Natural advertisement
- 23. Coalition/922: Exhibit Public records obtained from Multnomah
 County
- 24. Coalition/923: Exhibit Public records obtained from City of Portland
- 25. Coalition/924: Exhibit Public records obtained from City of Eugene
- 26. Coalition/925: Exhibit Public records obtained from City of Milwaukie
- 27. Coalition/926: Exhibit NW Natural Response to Coalition Data Request 78
- 28. Coalition/927: Exhibit NW Natural Response to Coalition Data

 Request 146, Attachment 2
- 29. Coalition/928: Exhibit NW Natural Response to Coalition Data

 Request 151, Attachment 2
- 30. Coalition/929: Exhibit NW Natural Response to Coalition Data Request 151, Attachment 3
- 31. Coalition/930: Exhibit NW Natural Response to Coalition Data
 Request 209
- 32. Coalition/931: CONFIDENTIAL Exhibit NW Natural Response to Coalition Data Request 11, Attachment 1

33. Coalition/932: CONFIDENTIAL Exhibit – NW Natural Response to

Coalition Data Request 208, Attachment 1

34. Coalition/933: CONFIDENTIAL Exhibit – NW Natural Response to

Coalition Data Request 208, Attachment 2

35. Coalition/934: CONFIDENTIAL Exhibit – NW Natural Response to

Coalition Data Request 104, Attachment 1

36. Coalition/935: CONFIDENTIAL Exhibit – NW Natural Response to

Coalition Data Request 192

The above-referenced testimony and exhibits that were previously filed are true and

accurate based upon my information and belief. If I were to answer these same questions today,

my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge

and believe and that I understand my testimony will be used as evidence before the Public

Utilities Commission of Oregon.

Dated this 23rd day of September, 2022.

s/ Greer Ryan

Greer Ryan

OF OREGON

UG 435

In the Matter of) DECLARATION OF) BRIAN STEWART
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,)
Request for a General Rate Revision.))
)
)

I, Brian Stewart, do hereby declare and say:

- My name is Brian Stewart, and I am the Founder of Electrify Now. I am appearing in
 this proceeding for Coalition of Communities of Color, Climate Solutions, Verde,
 Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and
 Sierra Club ("Coalition"). My business address is 5322 SW Hewett Blvd., Portland, OR
 97221.
- I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
- 3. I sponsored the following testimony and exhibits:
 - Coalition's Rebuttal and Cross-Answering Testimony of Brian Stewart and Exhibits (Coalition/700 through Coalition/708)
 - 1. Coalition/700: Rebuttal and cross-answering testimony of Brian Stewart
 - 2. Coalition/701: Qualification statement of Brian Stewart
 - 3. Coalition/702: Resume of Brian Stewart

4. Coalition/703: Exhibit – Synapse Report, Toward Net Zero Emissions

from Oregon Buildings, June 23, 2022

5. Coalition/704: Exhibit – RMI Report, Economic and Energy Analysis of

Building Electrification in Eugene, April 7, 2022

6. Coalition/705: Exhibit – NRDC comments, price comparison of heat

pumps vs. gas furnace and AC systems, November 12, 2020

7. Coalition/706: Exhibit – NEEA Report, Residential Building Stock

Assessment for Single-Family Homes 2016–2017

8. Coalition/707: Exhibit – NEEA Report, Residential Building Stock

Assessment for Multifamily Buildings 2016–2017

9. Coalition/708: NRDC Comments, draft environmental impact report for

2022 building standards

The above-referenced testimony and exhibits that were previously filed are true and

accurate based upon my information and belief. If I were to answer these same questions today,

my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge

and believe and that I understand my testimony will be used as evidence before the Public

Utilities Commission of Oregon.

Dated this 21st day of September, 2022.

s/ Brian Stewart

Brian Stewart