

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 435 and UG 411

In the Matter of NW NATURAL GAS)
COMPANY D/B/A NW NATURAL) ALLIANCE OF WESTERN ENERGY
Request for a General Rate Revision (UG) CONSUMERS AMENDED MOTION
435), and) TO ADMIT PRE-FILED TESTIMONY
Advice 20-19, Schedule 198 Renewable) AND EXHIBITS OF BRADLEY G.
Natural Gas Recovery Mechanism (ADV) MULLINS
1215) (UG 411).)
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Alliance of Western Energy Consumers (“AWEC”) respectfully moves for the admission of the following pre-filed testimony and exhibits of Bradley G. Mullins into the record as evidence in this proceeding:

1. AWEC's Opening Testimony and Exhibits Bradley G. Mullins (AWEC/Mullins 100-107)
 - a. AWEC/100 – Opening Testimony
 - b. AWEC/101 – Qualification Statement of Bradley G. Mullins
 - c. AWEC/102 – Revenue Requirement Summary
 - d. AWEC/103 – Responses to Data Requests
 - e. AWEC/104 – Capital Forecast Analysis
 - f. AWEC/105 – Non-Labor O&M Analysis
 - g. AWEC/106 – Schedule 197 – Pension Balancing Account Revenue Analysis
 - h. AWEC/107 – Schedule 183 – Environmental Cost Recovery Revenue Analysis

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2. AWEC's Rebuttal Testimony and Exhibits of Bradley G. Mullins (AWEC/200-201, Mullins).
 - a. AWEC/2000–AWEC Rebuttal Testimony
 - b. Confidential Exhibit AWEC/201 – AWEC Proposed Lexington RNG Rate Spread

In addition to the AWEC testimony referenced above, Mr. Mullins also co-sponsored the following testimony:

3. Stipulating Parties' Joint Testimony in Support of the Stipulation of Zachary D. Kravitz, Brian Fjeldheim, William Gehrke, Bradley Mullins, and Danny Kermod (NW Natural-Staff-CUB-AWEC-SBUA/100).
4. Stipulating Parties' Joint Reply Testimony to the Coalition's Objections to the First Stipulation of Zachary D. Kravitz, Brian Fjeldheim, William Gehrke, Bradley Mullins, and Danny Kermod (NW Natural-Staff-CUB-AWEC-SBUA/200).
5. 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).
6. 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 were previously filed with the Commission. The declaration of Bradley G. Mullins attesting to the truthfulness of his testimony and exhibits is attached to this motion.

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Dated this 20th day of September, 2022.

CABLE HUSTON LLP

A handwritten signature in blue ink, appearing to read "Chad M. Stokes", is positioned above a horizontal line.

Chad M. Stokes, OSB No. 004007
1455 SW Broadway, Suite 1500
Portland, OR 97201
Telephone: (503) 224-3092
E-Mail: cstokes@cablehuston.com

Of Attorneys for
Alliance of Western Energy Consumers

EXHIBIT A

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 435 / UG 411

In the Matter of NW NATURAL GAS
COMPANY D/B/A NW NATURAL

Request for a General Rate Revision (UG
435), and

Advice 20-19, Schedule 198 Renewable
Natural Gas Recovery Mechanism (ADV
1215) (UG 411).

DECLARATION OF BRADLEY G.
MULLINS

I, Bradley G. Mullins, declare the following:

1. My name is Bradley G. Mullins. I am a consultant for MW Analytics, an independent consulting firm representing utility customer before state public utility commissions in the Northwest and Intermountain West. I sponsored the following testimony:
 - i. AWEC's Opening Testimony and Exhibits Bradley G. Mullins (AWEC/Mullins 100-107)
 1. AWEC/100 -- Opening Testimony
 2. AWEC/101 -- Qualification Statement of Bradley G. Mullins
 3. AWEC/102 -- Revenue Requirement Summary
 4. AWEC/103 -- Responses to Data Requests
 5. AWEC/104 -- Capital Forecast Analysis
 6. AWEC/105 -- Non-Labor O&M Analysis
 7. AWEC/106 -- Schedule 197 – Pension Balancing Account Revenue Analysis
 8. AWEC/107 -- Schedule 183 – Environmental Cost Recovery Revenue Analysis
 - ii. AWEC's Rebuttal Testimony and Exhibits of Bradley G. Mullins (AWEC,/200-201, Mullins)
 1. AWEC/200 -- AWEC Rebuttal Testimony
 2. Confidential Exhibit AWEC/201 -- AWEC Proposed Lexington RNG Rate Spread

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

- iii. Stipulating Parties' Joint Testimony in Support of the Stipulation of Zachary D. Kravitz, Brian Fjeldheim, William Gehrke, Bradley Mullins, and Danny Kermode (NW Natural-Staff-CUB-AWEC-SBUA/100).
- iv. Stipulating Parties' Joint Reply Testimony to the Coalition's Objections to the First Stipulation of Zachary D. Kravitz, Brian Fjeldheim, William Gehrke, Bradley Mullins, and Danny Kermode (NW Natural-Staff-CUB-AWEC-SBUA/200).
- v. 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).
- vi. 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 belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon.

Dated this 20th day of September, 2022.



Bradley G. Mullins