

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 435**

In the Matter of  
NORTHWEST NATURAL GAS  
COMPANY,  
Request for a General Rate Revision.

**STAFF MOTION TO ADMIT  
PRE-FILED EXHIBITS**

Staff of the Oregon Public Utility Commission moves the Administrative Law Judge to admit the following pre-filed exhibits into the record in the above-captioned docket.

Staff 100	Opening Testimony of Matt Muldoon
Staff 101	Muldoon Witness Qualifications Statement
Staff 102	ROE – Three-Stage DCF: Peer Screen, Dividends, EPS, and Hamada Equation (electronic)
Staff 103	ROE – Three-Stage DCF: Models X and Y (electronic)
Staff 104	ROE – Three-Stage DCF: Summary and Recommendation (electronic)
Staff 105	ROE: CAPM and Gordon Growth – Single Stage DCF (electronic)
Staff 106	ROE: BEA Historical GDP Growth (electronic)
Staff 107	ROE: TIPS Implied Inflation (electronic)
Staff 108	ROE: Financial News that Investors in Natural Gas Utilities are Seeing
Staff 109	Value Line (VL) Natural Gas Utilities
Staff 200	Opening Testimony of Brian Fjeldheim (adopted by Matt Muldoon)
Staff 201	Fjeldheim Witness Qualifications Statement
Staff 202	NW Natural Responses to Staff Data Request Nos. 293, 294, 295, 296, 297, 475, 476, 477, 478, 479, 480, 481, 482, and 483
Staff 203	Confidential Exhibits in Support of Opening Testimony
Staff 300	Opening Testimony of John Fox

1	Staff 301	Fox Witness Qualifications Statement
2	Staff 302	NW Natural Responses to Staff Data Request Nos. 164, 165, 166, 167, 168,
3		169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183,
4		205, 206, 229, 302, 303, 304, 328, 345, 346, 347, and 358
5	Staff 303	Confidential Exhibits in Support of Opening Testimony
6	Staff 400	Testimony of Ryan Bain, Ph.D.
7	Staff 401	Bain Witness Qualifications Statement
8	Staff 402	NW Natural Responses to Staff Data Request Nos. 283, 284, 285, 286, 287,
9		366, 438, 439, 440, and 441
10	Staff 403	Exhibits in Support of Testimony (electronic)
11	Staff 500	Opening Testimony of Madison Bolton
12	Staff 501	Bolton Witness Qualifications Statement
13	Staff 502	NW Natural Responses to Staff Data Request Nos. 260, 261, 434, 435, 436, and 437
14	Staff 503	Confidential NW Natural Response to Staff Data Request No. 260
15		(electronic)
16	Staff 600	Opening Testimony of Heather Cohen
17	Staff 601	Cohen Witness Qualifications Statement
18	Staff 602	NW Natural Responses to Staff Data Request Nos. 93, 278, and 361 (hard
19		copy) and 143, 153, 265, 276, 344, 352 and 364 (electronic)
20	Staff 603	Confidential Exhibits in Support of Opening Testimony (electronic)
21	Staff 604	Confidential Exhibits in Support of Opening Testimony (electronic)
22	Staff 700	Opening Testimony of Curtis Dlouhy, Ph.D.
23	Staff 701	Dlouhy Witness Qualifications Statement
24	Staff 702	NW Natural Responses to Staff Data Request Nos. 60, 282, and 419
25	Staff 703	Relevant News
26	Staff 704	NW Natural Confidential Responses to Staff Data Requests

1	Staff 800	Opening Testimony of Moya Enright
2	Staff 801	Enright Witness Qualifications Statement
3	Staff 802	Confidential Exhibits in Support of Opening Testimony
4	Staff 803	Confidential Exhibits in Support of Opening Testimony
5	Staff 804	NW Natural Responses to Staff Data Request Nos. 143, 199, 207, 210, 232
6		(confidential) and AWEC Data Request No. 14 (confidential)
7	Staff 900	Opening Testimony of Brett Farrell
8	Staff 901	Farrell Witness Qualifications Statement
9	Staff 902	NW Natural Responses to Staff Data Request Nos. 143, 201, 404, 405, and
10		408
11	Staff 903	Work paper showing adjustment calculations for O&M and A&G
12		(electronic)
13	Staff 1000	Opening Testimony of Julie Jent
14	Staff 1001	Jent Witness Qualifications Statement
15	Staff 1002	NW Natural Responses to Staff Data Request Nos. 104, 152, 58, 422, 433,
16		239, 246 (all hard copies) and 424, 153, 273, 248, 274, 254, 155, 152, 057,
17		240, 275 (electronic only); Staff work papers “Non-Confidential Figures”
18		and “Adjustments Escalated” (electronic); and NW Natural’s Report of 2021
19		Promotional Concessions Campaigns filed in Docket No. RG 31.
20	Staff 1003	Confidential Staff work paper “Confidential Figures”, Confidential NW
21		Natural Responses to Staff Data Request Nos. 69, 74, 451, 453, 247(all
22		electronic), and 450, 449, 453, 452 (all hard copy).
23	Staff 1100	Opening Testimony of Ming Peng
24	Staff 1101	Peng Witness Qualifications Statement
25	Staff 1102	NW Natural Response to Staff Data Request No. 124
26	Staff 1200	Opening Testimony of Paul Rossow

1	Staff 1201	Rossow Witness Qualifications Statement
2	Staff 1202	Exhibits in Support of Opening Testimony (electronic)
3	Staff 1300	Opening Testimony of Michelle Scala
4	Staff 1301	Scala Witness Qualifications Statement
5	Staff 1302	NW Natural Responses to Staff Data Request Nos. 368, 370, 372, 373, 375,
6		382, 383, 385, 398, 397, 457, 458, 459, 460, 461, 463 (hard copy), 389, 398,
7		and 454 (electronic)
8	Staff 1303	Work papers, “NW Natural/1401 WP6 Long-Run Incremental Cost Study
9		(LRIC) Model” (electronic); “NW Natural/1402 WP1 Rate Spread Proposal
10		Methodology” (electronic); and “Staff OT UG 435 Proposed Rate Spread
11		WP” (electronic)
12	Staff 1400	Opening Testimony of Steve Storm
13	Staff 1401	Storm Witness Qualifications Statement
14	Staff 1402	NW Natural Responses to Staff Data Request Nos. 299 and 300
15	Staff 1403	Confidential Exhibits in Support of Opening Testimony
16	Staff 1500	Opening Joint Testimony of Dlouhy-Fox-Storm
17	Staff 1501	NW Natural Responses to Staff Data Request Nos. 413, 414, 416, and 417
18	Staff 1600	Opening Testimony of Scott Gibbens
19	Staff 1601	Gibbens Witness Qualifications Statement
20	Staff 1602	NW Natural Response to Staff Data Request No. 458
21	Staff 1700	Highly Confidential Opening Testimony of Matt Muldoon: Lexington
22		Renewable Natural Gas Project
23	Staff 1800	Response Testimony of Matt Muldoon
24	Staff 1801	Hydrogen Mega Hub News
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1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UG 435**

4 In the Matter of )  
5 NW NATURAL GAS COMPNY, )  
6 dba NW NATURAL, ) **DECLARATION OF**  
7 Request for General Rate Revision. ) **MATT MULDOON**

8 I, MATT MULDOON, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Financial Analyst in the Energy Rates, Finance and Audit  
10 Division of the Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff 100, 1700, 1800, and a drafted a witness qualifications  
13 statement, pre-filed as Staff 101.

14 3. I have reviewed and adopt testimony of Brian Fjeldheim, pre-filed as Staff 200,  
15 and Moya Enright, pre-filed as Staff 800. I have also reviewed and adopt testimony co-  
16 sponsored by Brian Fjeldheim pre-filed as NW Natural-Staff-CUB-AWEC-Coalition 100 and  
17 200, NW Natural-Staff-CUB-AWEC 100 and Joint Reply Testimony of Small Business Utility  
18 Advocates’ Objections to the Second Stipulation 100.

19 To the best of my knowledge, my pre-filed testimony and witness qualifications  
20 statement are true and accurate.

21 I hereby declare that the above statement is true to the best of my knowledge and  
22 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

23 SIGNED this 20<sup>th</sup> day of September, 2022.

24 */s/ Matt Muldoon*

25 \_\_\_\_\_  
26 **MATT MULDOON**

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
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3 **UG 435**

4 In the Matter of )  
5 NORTHWEST NATURAL GAS )  
6 COMPANY, dba NW NATURAL, )  
7 Request for a General Rate Increase. )  
\_\_\_\_\_ )

**DECLARATION OF  
JOHN FOX**

8 I, JOHN FOX, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Financial Analyst in the Rates, Finance and Audit Division of the  
10 Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 300, co-sponsored testimony pre-filed as Staff  
13 Exhibit 1500, and drafted a witness qualifications statement, pre-filed as Staff Exhibit 301. I  
14 have also reviewed and adopt the testimony of Heather Cohen pre-filed as Staff Exhibit 600.

15 To the best of my knowledge, my pre-filed testimony and witness qualifications  
16 statement are true and accurate.

17 I hereby declare that the above statement is true to the best of my knowledge and  
18 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

19 SIGNED this 20<sup>th</sup> day of September, 2022.

20 */s/ John Fox*

21 \_\_\_\_\_  
22 JOHN FOX

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
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3 **UG 435**

4 In the Matter of )  
5 NORTHWEST NATURAL GAS COMPANY, )  
6 dba NW Natural, )  
7 Request for a General Rate Revision. )

**DECLARATION OF  
RYAN BAIN**

8 I, RYAN BAIN, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Strategy and Integration Division of the Public  
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 400 and drafted a witness qualifications  
13 statement, pre-filed as Staff Exhibit 401.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19  
20 */s/ Ryan Bain, Ph.D.*

21 \_\_\_\_\_  
RYAN BAIN, Ph.D.



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7 Request for a General Rate Revision. )

**DECLARATION OF  
MADISON BOLTON**

8 I, MADISON BOLTON, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a UTILITY ANALYST in the Strategy and Integration Division of the  
10 Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 500, and drafted a witness qualifications  
13 statement, pre-filed as Staff Exhibit 501.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19 */s/ Madison Bolton*

20 \_\_\_\_\_  
21 MADISON BOLTON

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5 NORTHWEST NATURAL GAS COMPANY, )  
6 dba NW NATURAL, )  
7 Request for a General Rate Revision. )

**DECLARATION OF  
CURTIS DLOUHY**

8 I, CURTIS DLOUHY, state the following, under penalty of perjury in the State of Oregon:

9 1. I am an Economist in the Strategy and Integration Division of the Oregon Public  
10 Utility Commission.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 700, co-sponsored testimony pre-filed as Staff  
13 1500, and drafted a witness qualifications statement, pre-filed as Staff Exhibit 701.

14 To the best of my knowledge, my pre-filed testimony and my witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19 */s/ Curtis Dlouhy, Ph.D.*

20 \_\_\_\_\_  
21 CURTIS DLOUHY, Ph.D.

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5 NORTHWEST NATURAL GAS COMPANY, )  
6 dba NW NATURAL, )  
7 Request for a General Rate Revision. )  
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**DECLARATION OF  
BRET FARRELL**

8 I, BRET FARELL, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Strategy and Integration Division of the Public  
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 900 and drafted a witness qualifications  
13 statement, pre-filed as Staff Exhibit 901.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19 */s/ Bret Farrell*

20 \_\_\_\_\_  
21 BRET FARRELL

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6 COMPANY dba NW NATURAL, )  
7 Request for a General Rate Revision. )

**DECLARATION OF  
JULIE JENT**

8 I, JULIE JENT, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Utility Analyst in the Rates, Finance and Audit Division of the Public  
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 1000 and drafted a witness qualifications  
13 statement, pre-filed as Staff Exhibit 1001.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19 */s/ Julie Jent*

20 \_\_\_\_\_  
21 JULIE JENT

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5 NORTHWEST NATURAL GAS )  
6 COMPANY dba NW NATURAL, )  
7 Request for a General Rate Revision. )

**DECLARATION OF  
MING PENG**

8 I, MING PENG, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Rates, Finance and Audit Division of the Public  
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 1100 and drafted a witness qualifications  
13 statement, pre-filed as Staff Exhibit 1101.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19  
20 */s/ Ming Peng*

21 \_\_\_\_\_  
MING PENG

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5 NORTHWEST NATURAL GAS )  
6 COMPANY dba NW NATURAL, )  
7 Request for a General Rate Revision. )

**DECLARATION OF  
PAUL ROSSOW**

8 I, PAUL ROSSOW, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Utility Analyst in the Rates, Finance and Audit Division of the Public  
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 1200 and drafted a witness qualifications  
13 statement, pre-filed as Staff Exhibit 1201.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19  
20 */s/ Paul Rossow*

21 PAUL ROSSOW  
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23  
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26

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6 dba NW NATURAL, )  
7 Request for a General Rate Revision. )

**DECLARATION OF  
MICHELLE SCALA**

8 I, MICHELLE SCALA, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Utility and Energy Analyst 3 in the Strategy and Integration Division of the  
10 Oregon Public Utility Commission.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 1300, co-sponsored testimony pre-filed as Staff  
13 1500, and drafted a witness qualifications statement, pre-filed as Staff Exhibit 1301.

14 To the best of my knowledge, my pre-filed testimony and my witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20th day of September, 2022.

19 */s/ Michelle Scala*

20 \_\_\_\_\_  
21 MICHELLE SCALA

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5 NORTHWEST NATURAL GAS )  
6 COMPANY dba NW NATURAL, )  
7 Request for a General Rate Increase. )

**DECLARATION OF  
STEVE STORM**

8 I, STEVE STORM, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Economist in the Rates, Finance and Audit Division of the Public  
10 Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the  
12 above-captioned docket pre-filed as Staff Exhibit 1400, co-sponsored testimony pre-filed as Staff  
13 Exhibit 1500, and drafted a witness qualifications statement, pre-filed as Staff Exhibit 1401.

14 To the best of my knowledge, my pre-filed testimony and witness qualifications  
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and  
17 belief, and that I understand it is made for use as evidence in court and is subject to  
penalty for perjury.

18 SIGNED this 20<sup>th</sup> day of September, 2022.

19  
20 */s/ Steve Storm*

21 \_\_\_\_\_  
22 STEVE STORM