

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 435**

In the Matter of  NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,  Request for a General Rate Revision.	) PETITION TO INTERVENE BY ) COALITION OF COMMUNITIES ) OF COLOR, CLIMATE ) SOLUTIONS, VERDE, COLUMBIA ) RIVERKEEPER, OREGON ) ENVIRONMENTAL COUNCIL, ) COMMUNITY ENERGY PROJECT, ) and SIERRA CLUB
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Pursuant to ORS 756.525 and OAR 860-001-0300(2), Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club petition to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information of the petitioners are as follows:

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Name: Rose Monahan  
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2. Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (collectively “Petitioners”) will be represented by Jaimini Parekh and Kristen L. Boyles from Earthjustice and Carra Sahler from the Green Energy Institute of Lewis and Clark Law School. Their contact information for inclusion in the service list is:

Jaimini Parekh  
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3. Petitioners also request that Adam Hinz, paralegal at Earthjustice, be included on the service list:

Adam Hinz  
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4. The Coalition of Communities of Color (“CCC”) addresses the socioeconomic disparities, institutional racism, and inequity of services experienced by their families, children and communities; and to organize their communities for collective action resulting in social change to obtain self-determination, wellness, justice and prosperity. CCC is a coalition representing the interests of eighteen member organizations, many based in the Portland, Oregon area.

5. Climate Solutions is a regional non-profit working to accelerate clean energy solutions to the climate crisis. As part of this work, Climate Solutions supports a rapid and

equitable transition to clean, fossil-free buildings for all. Climate Solutions has over 18,000 supporters in the Pacific Northwest, and almost 8,000 supporters in the State of Oregon.

6. Verde is a non-profit organization based in Portland with the mission to build environmental wealth through organizing, advocacy, and social enterprise. Verde works statewide, and is rooted in the Cully community in Portland, a classic environmental justice community that is mostly Indigenous, Black, and Latinx and low-income and pollution-impacted.

7. Columbia Riverkeeper's mission is to protect and restore the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Riverkeeper's vision is to unite people to fight for clean water, abundant fish and wildlife, and our climate. Columbia Riverkeeper represents approximately 16,000 members and supporters.

8. The Oregon Environmental Council (“OEC”) is a nonprofit, nonpartisan, membership-based organization that advances innovative, collaborative, and equitable solutions to Oregon’s environmental challenges for today and future generations. OEC’s goals are a stable climate that safeguards communities and the economy; clean and plentiful water that supports people, fish and wildlife; and healthy homes and neighborhoods free of air pollution and hazardous chemicals.

9. Community Energy Project (“CEP”) provides free services focused on safety, health, and energy efficiency from community education and supplies to direct home energy upgrades and repairs. CEP believes that everyone deserves a safe, healthy, efficient home, regardless of income. CEP works with frontline communities, many of whom struggle to pay existing utility bills.

10. Sierra Club, founded in 1892, is the nation's oldest non-profit, grassroots environmental organization. The Oregon Chapter of the Sierra Club is a non-profit, member-support, public interest organization that promotes the conservation of the Oregon natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than 21,000 members in the state. Sierra Club’s nearly 800,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. One of the Sierra Club’s priorities is to advance smart and equitable clean energy solutions that address critical problems from the climate crisis, air pollution, and our nation's dependence on fossil fuels.

11. **Interests of the Petitioners in this proceeding:** Petitioners represent a broad coalition of environmental, climate, environmental justice and community-led social justice organizations who represent the interests of thousands of members and supporters—many of whom are gas utility ratepayers in the State of Oregon, including within the NW Natural service area. Petitioners are concerned with the significant proposed rate increases for gas utility customers proposed by NW Natural in its application for a general rate revision, and NW Natural’s failure to wait for differential rate requirements for low-income ratepayers as set out in HB 2475. Further, Petitioners are concerned with the significant capital expenditures proposed by NW Natural that would continue to build out fossil fuel infrastructure during the climate crisis when the State of Oregon is seeking to dramatically reduce its carbon emissions and transition away from reliance on fossil fuels. Petitioners are concerned that failing to lower energy burdens and mitigate the costs of energy would continue to leave behind environmental justice and low-income communities, and that it would impose increasingly high and significant costs on them to

pay for stranded fossil fuel assets. Lastly, Petitioners are concerned with NW Natural's proposal to recover advertising costs and executive compensation from ratepayers.

12. Based on the information provided above in accordance with the Commission's rules of procedure, Petitioners request to participate in this proceeding as intervenors. Petitioners' participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. OAR 860-001-0300.

13. WHEREFORE, Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club respectfully request leave to intervene and request all the rights of a party in this proceeding.

Dated this 16th day of February, 2022.

Respectfully submitted,

/s/ Jaimini Parekh

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