

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 435**

In the Matter of	)	NOTICE TO PARTICIPATE &
	)	REQUEST HB 2475 INTERIM
NORTHWEST NATURAL GAS COMPANY,	)	INTERVENOR FUNDING OF
dba NW NATURAL,	)	COALITION OF COMMUNITIES
	)	OF COLOR
Request for a General Rate Revision.	)	
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The Coalition of Communities of Color hereby submits its Notice to Participate & Request Funding in this docket and requests interim intervenor funding in accordance with Oregon House Bill 2475 (HB 2475).

The Oregon Legislature only recently authorized the Commission to provide intervenor funding to groups representing the broad interests of customers, interests of low-income residential customers, or interests of residential customers that are members of environmental justice communities. Coalition of Communities of Color (CCC) is an eligible organization for HB 2475 interim inventor funding. CCC represents an alliance of culturally specific community-based organizations with representation from African, African American, Asian, Latine, Middle Eastern and North African, Pacific Islander, and Slavic communities. CCC supports a collective racial justice effort to improve outcomes for communities of color through policy analysis and advocacy, environmental justice, and culturally-appropriate data and research. Through its environmental justice work, CCC seeks to advance solutions to climate change that are grounded in the lived experience, concerns, and priorities of low-income communities of color. These communities are disproportionately harmed by climate change and the burning of fossil

fuels, and are impacted significantly by increases in the cost to heat and fuel their homes. CCC's member organizations work directly with community members to provide direct services and collaborative advocacy, and several of the directors of these community-based organizations sit on CCC's board.

UG 435 is an eligible proceeding under Commission order No. 22-043. UG 435 is a contested case that affects the rates charged to NW Natural customers, and therefore impacts its low-income resident customers and environmental justice communities. The residents of CCC's member organizations will be impacted by this docket as they will be affected by the increased rates if approved.

For the past few months, CCC participated in stakeholder meetings with Administrative Law Judge Nolan Moser. These meetings provided information on the availability of funding and also developed the process for soliciting intervenor funds. CCC is submitting this request now to seek reimbursement solely for the participation of its staff in this case. In Order No. 22-043, CCC was listed as one of several "groups preliminarily eligible" for HB 2475 interim intervenor funding.

Coalition of Communities of Color respectfully requests that this Commission grant its Notice to Participate in these proceedings as an eligible organization and its request to receive HB 2475 interim intervenor funding.

Dated this 24th day of August 2022.



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Pursuant to decisions deeming Coalition of Communities of Color (CCC) and these proceedings eligible for intervenor funding, CCC requests \$3,150 from the HB 2475 Intervenor Funding Fund. CCC has been participating in this proceeding since February 16, 2022, when CCC petitioned to intervene in this contested case, along with Sierra Club, Verde, Community Energy Project, Columbia Riverkeeper, Oregon Environmental Council, and Climate Solutions. CCC submits the following in support of the proposed budget attached as Attachment A.

*Statement of Work to be Performed*

CCC’s Climate and Energy Policy Manager, Nikita Daryanani, has and intends to participate in regular coalition meetings with other members of our intervening coalition (including Verde, Sierra Club, Climate Solutions, Columbia Riverkeeper, Oregon Environmental Council, and Community Energy Project and attorneys from Earthjustice and Green Energy Institute). These meetings have been taking place almost bi-weekly since March 2022. Nikita Daryanani has also attended one PUC public hearing on March 10, 2022, and has reviewed testimony filed in the proceedings and attorney communications.

*Description of Areas to be Investigated*

CCC has and intends to continue to investigate issues related to the impacts of NWNatural's proposed rate increase on low-income customers, and the impacts of the company's activities on frontline, environmental justice communities. Such impacts include the cost and environmental implications of fossil gas system expansion on residential customers.

CCC is concerned with the use of ratepayer dollars on promotional materials and activities that are misaligned with the urgent need to reduce greenhouse gas emissions and seek to obfuscate the negative health effects of natural gas. CCC has and will continue to review and analyze testimony and briefing and provide feedback to counsel.

*The Budget Showing Estimated Fees and Costs*

Attachment A outlines the estimated fees and costs.

CCC respectfully requests the Commission approve its budget and issue an order awarding it a grant from the HB 2475 Fund in the amount requested.

Dated this 24th day of August 2022.



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ATTACHMENT A

COALITION OF COMMUNITIES OF COLOR PROPOSED BUDGET

UG 435

<b>CCC INTERNAL EXPENSES</b>	<b>RATE</b>	<b>HOURS</b>	<b>COST</b>
<i>Staff</i>			
Nikita Daryanani, Climate and Energy Policy Manager	\$150	21.00	\$3,150
<b>Total</b>			<b>\$3,150</b>