



April 19, 2023

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Post Office Box 1088  
Salem, OR 97308-1088

**Re: AR 655 – In the Matter of Rulemaking Regarding Filing, Review, and Update of Clean Energy Plans, revising OAR 860-027-0400 – NW Natural Comments**

In accordance with the Memorandum issued in this docket by Administrative Law Judge Mellgren on March 2, 2023, Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), hereby files its comments on the proposed rulemaking regarding revisions to the Public Utility Commission of Oregon’s (“Commission’s”) Division 27 administrative rules (“Rules”) related to Clean Energy Plans (“CEPs”).

NW Natural comments on proposed Rule 860-027-0400(7), with proposed revisions in underline (additions) and strikethrough (deletions) formats as follows:

~~(57)~~ Commission staff and parties must file their comments and recommendations ~~within six months of IRP, and when applicable, their CEP comments and recommendations, generally within six months of IRP filing. If the CEP is not filed with the IRP, Commission staff and parties must file their comments and recommendations generally within six months of CEP filing.~~

The Company is concerned that the addition of the first reference to “generally” could be interpreted wrongly to apply to the timing of comments and recommendations filed by Commission Staff (“Staff”) and parties on an electric company’s *or gas company’s* underlying Integrated Resource Plan (“IRP”) and not specifically on the electric company’s CEP filing. As proposed to be revised, Rule 860-027-0400(7) would require Commission Staff and parties to file their comments and recommendations on an IRP filing “generally” within six months of IRP filing. The addition of the concept of “generally” would introduce a degree of uncertainty into an IRP filing that does not exist in the current Rules. The Staff Report in this matter, filed December 5, 2022, clearly states on page 10 that “Staff’s goal is to incorporate basic procedural rules for the CEP into the existing IRP rules *without disturbing the IRP rules that apply to all electric and gas IRPs*” (emphasis added). NW Natural agrees with Staff’s goal and, accordingly, respectfully requests that proposed Rule 860-027-0400(7) be revised as follows to avoid any possible misinterpretation:

(57) Commission staff and parties must file their comments and recommendations within six months of IRP filing, and when applicable, their CEP comments and recommendations generally within six months of IRP filing. If the CEP is not filed with the IRP, Commission staff and parties must file their comments and recommendations generally within six months of CEP filing.

Respectfully submitted,

/s/ Eric W. Nelsen

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