BEFORE THE PUBLIC UTILITY COMMISSION 1 **OF OREGON** 2 **UG 462** 3 4 In the Matter of 5 NORTHWEST NATURAL GAS MOTION TO ADMIT PRE-FILED COMPANY dba NW NATURAL, STAFF EXHIBITS 6 Renewable Natural Gas Adjustment 7 Mechanism—Dakota City.

Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law 9 10

Judge to admit the following pre-filed Staff Exhibits into the record in the above-captioned

11 docket:

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13	Exhibit No.	Exhibit
14	Staff Exhibit 100	Opening Testimony of Ted Drennan
15	Staff Exhibit 101	Witness Qualification Statement of Ted Drennan
16	Staff Exhibit 102	NW Natural Responses to Data Requests
17	Staff Exhibit 103	Confidential NW Natural Responses to Data Requests
18	Staff Exhibit 104	Staff Alternative Analysis
19	Staff Exhibit 200	Rebuttal Testimony of Ted Drennan
20	Staff Exhibit 201	Confidential Staff Workpaper on Risk Analysis
21	Staff Exhibit 202	NW Natural Response to Data Request 41, Attachment 1
22	Staff Exhibit 203	Highly Confidential NW Natural Response to Data Request 10
23	Staff Exhibit 204	Confidential NW Natural's Supplemental Response to Data Request 30

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1	This Motion to Admit Pre-Filed Staff Ex	xhibits is supported by the Declaration of Staff
2	witness Ted Drennan. This witness attests to the	ne truthfulness of their testimony. The
3	Declaration is attached to this motion.	
4	DATED this 7 th day of September 2023.	
5		Respectfully submitted,
6		ELLEN F. ROSENBLUM
7		Attorney General
8		/s/ Johanna M. Riemenschneider
9		Johanna M. Riemenschneider, OSB No. 990083
10		Senior Assistant Attorney General Of Attorneys for Staff of the Public Utility
11		Commission of Oregon
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1	BEFORE THE PUBLIC UTILITY COMMISSION				
2	OF OREGON				
3	UG 462				
4	In the Matter of				
5	NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL DECLARATION OF TED DRENNAN				
6 7	Renewable Natural Gas Adjustment Mechanism—Dakota City.)				
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9	I, Ted Drennan, state the following, under penalty of perjury in the State of Oregon:				
10	1. I am employed by the Public Utility Commission of Oregon Staff ("Staff"). I work				
11	as an Energy Policy Analyst in the Utility Strategy and Integration Division.				
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in				
13	this docket as Staff Exhibit 100 (Staff Opening Testimony), Staff Exhibit 101 (witness				
14	qualification statement), Confidential Staff Exhibit 104 (Staff Alternative) Staff Exhibit 200 (Staff				
15	Rebuttal Testimony) and Confidential Staff Exhibit 201 (Staff workpapers).				
16	I am also a supporting witness for the joint testimony that was pre-filed in support of the				
17	Comprehensive Stipulation, Exhibit Stipulating Parties/100.				
18	3. To the best of my knowledge, my pre-filed testimony is true and accurate.				
19					
20	I hereby declare that the above statement is true to the best of my knowledge and				
21	belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.				
22					
23	SIGNED this 31 day of August 2023.				
24	Ted Drennan				
25	Ted Drennan				
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