



Oregon

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Subject: Oregon Public Utility Commission Staff's Comments on Procedural Equity in Docket No. UG 490 – Northwest Natural Gas Company's 2024 General Rate Revision

On January 3, 2024, letters of concern over procedural equity were posted to the record of Docket No. UE 426 Idaho Power Company's 2024 General Rate Revision. In response, Staff proposed including additional process in the docket's procedural schedule to provide a public forum for non-intervenors to participate in energy justice issue advocacy with intervenors, Staff, and Idaho Power before the Commission at a public meeting.

Staff is proposing to incorporate an equivalent additional process in Docket No. UG 490, Northwest Natural's 2024 General Rate Revision. After conferring with stakeholders, Staff finds replicating the approach here will help us continue and extend efforts to that address procedural inequities in Commission processes. Staff recognizes this work is ongoing and will continue to engage with parties, advocates, and communities to advance inclusive representation.

In alignment with the previously adopted proposal for procedural equity in general rate revisions, Staff has identified the following initial strategies to continue making process on procedural equity issues in the Northwest Natural General Rate Case and looks forward to further discussion with parties:

1. **Commissioner Workshop:** A Commissioner workshop held in advance of the first settlement conference on high-priority issues identified by Staff and interested parties that impact environmental justice communities, such as Northwest Natural's income qualified bill discount revisions. The workshop is an opportunity to center the perspectives of representatives from environmental justice communities, including intervenors and non-intervenor, and allows the Commission to express minimum expectations for resolution of priority issues if desired.
2. **Procedural Intentionality Regarding Settlement Conferences:** Staff will work with parties to structure settlement conferences and multi-party engagements to better reflect the resource disparities environmental justice advocate organizations face in rate case settlement and maximize the reach of HB 2475 intervenor funds. For example, Staff will ensure that high priority issues for intervenors representing environmental justice communities are discussed only during designated times where those intervenors can be present.
3. **Public Participation and Language Accessibility:** Staff encourages the Administrative Hearings Division to provide multiple opportunities for meaningful public comment from

the advocate community and individual members of the public through written or verbal comments. Staff is committed to incorporating public input in its analysis and supporting the Administrative Hearings Division in promoting language accessibility and other improvements to public comment processes under consultation with advocates.

Staff's goal in these initiatives is to ensure that all stakeholders, especially those from historically underrepresented communities, can effectively participate in and influence the outcome of this proceeding in an equitable manner. As expressed in UE 426, and echoed here, procedural justice ensures that the processes leading to decisions are fair, transparent and advance equitable outcomes. Staff recognizes that decisions made through a procedurally just process are more likely to be supported by the public impacted by them, such that an equitable process provides all parties with the assurance that their voices were heard. Staff clarifies that procedural justice is still developing in PUC proceedings and that this strategy does not address all the barriers and limitations faced by groups wishing to participate and influence outcomes. Staff encourages continued dialogue on how to improve this and future strategies in the interest of equity and appreciates engagement on this topic.

We look forward to constructive feedback with all parties involved and remain dedicated to ensuring that our proceedings reflect our agency's commitment to equity and justice.

Dated at Salem, Oregon, this 9th day of February, 2024.

Michelle Scala /s/

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