BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 435

)

In the Matter of

NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,

) COALITION'S CROSS-) EXAMINATION EXHIBITS

Request for a General Rate Revision.

CROSS-EXAMINATION EXHIBITS

Pursuant to Administrative Law Judge Sarah Spruce's July 27, 2022, Ruling, Intervenors Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (the "Coalition") hereby submit the following stipulated Cross-Examination Exhibits for inclusion in the administrative record in this proceeding. The exhibits listed below are attached to this filing.

Exhibits Coalition/1000 through Coalition/1002 pertain to the cross-examination of NW Natural witnesses Kimberly A. Heiting and Ryan J. Bracken. Exhibit Coalition/1003 pertains to the cross-examination of NW Natural witnesses John D. Frankel and Mary O. Moerlins.

- Coalition/1000 NW Natural response to Coalition's Data Request 219.
- Coalition/1001 NW Natural response to Coalition's Data Request 66.
- Coalition/1002 NW Natural response to Coalition's Data Request 67.
- Coalition/1003 Excerpts of NW Natural response to Coalition's Data Request
 44, Attachment 1, NW Natural Investor Presentation dated September 2021.

Earthjustice 810 Third Ave. Suite 610 Seattle, WA 98104 (206) 343-7340 Dated this 28th day of July, 2022.

Respectfully submitted,

/s/ Jaimini Parekh Jaimini Parekh Senior Attorney, WSBA No. 53722 (admitted pro hac vice) Kristen L. Boyles Managing Attorney, WBSA No. 23806 (admitted pro hac vice) Earthjustice 810 Third Avenue, Suite 610 Seattle, WA 98104 206-343-7340 jparekh@earthjustice.org kboyles@earthjustice.org

/s/ Carra Sahler

Carra Sahler Staff Attorney, OSB No. 024455 Green Energy Institute at Lewis & Clark Law School 10101 S. Terwilliger Blvd. Portland, OR 97219 503-768-6634 sahler@lclark.edu

Earthjustice 810 Third Ave. Suite 610 Seattle, WA 98104 (206) 343-7340

Coalition/1000

NW Natural[®] Rates & Regulatory Affairs UG 435 Request for a General Rate Revision <u>Data Request Response</u>

Request No.: UG 435 Coalition DR 219

219. Does NW Natural have a line item budget for FERC Account No. 426.4? If so, please provide a line item budget for NW Natural's 2021 expenditures for FERC Account No. 426.4. For each expenditure involving compensation for salary for NW Natural staff, please include the name of the employee, the total hours expended by that employee, and the governmental entity lobbied.

Response:

Please see the Company's responses to UG 435 Coalition DRs 66 and 67.

NW Natural[®] Rates & Regulatory Affairs UG 435 Request for a General Rate Revision <u>Data Request Response</u>

Request No.: UG 435 Coalition DR 66

66. Please provide all documents related to NW Natural's Account 426-04950.

Response:

"The Company objects to this data request under 860-001-0500 because the request for "all documents" is burdensome, overly broad and not commensurate with the needs of this case, the resources available to the parties or the importance of the issues to which the discovery relates. NW Natural further objects that DR 66 is beyond the scope of this case as Account 426-04950 is the Company's Lobbying account and is classified under FERC Account 426.4 Expenditures for certain civic, political and related activities below the line and is not included in the Company's UG 435 Test Year.

NW Natural[®] Rates & Regulatory Affairs UG 435 Request for a General Rate Revision <u>Data Reguest Response</u>

Request No.: UG 435 Coalition DR 67

67. Please provide all documents related to NW Natural's Account 426-04953.

Response:

The Company objects to this data request under 860-001-0500 because the request for "all documents" is burdensome, overly broad and not commensurate with the needs of this case, the resources available to the parties or the importance of the issues to which the discovery relates. Without waiving this objection, the Company responds as follows: The Company does not have an Account 426-04953, but instead interpreted this DR to refer to Account 426-04935. Based on this understanding of the request, NW Natural further objects to DR 67 as beyond the scope of this case as NW Natural's Account 426-04935 is the Company's Civic Expense account and is classified under FERC Account 426.4 Expenditures for certain civic, political and related activities below the line and is not included in the Company's UG 435 Test Year.

Coalition/1003

UG 435 Coalition DR 44 Attachment 1 Page 1 of 51

NW Natural HOLDINGS™

INVESTOR PRESENTATION

SEPTEMBER 2021

SOPHISTICATED MARKETING

Affordable, Preferred, Growing

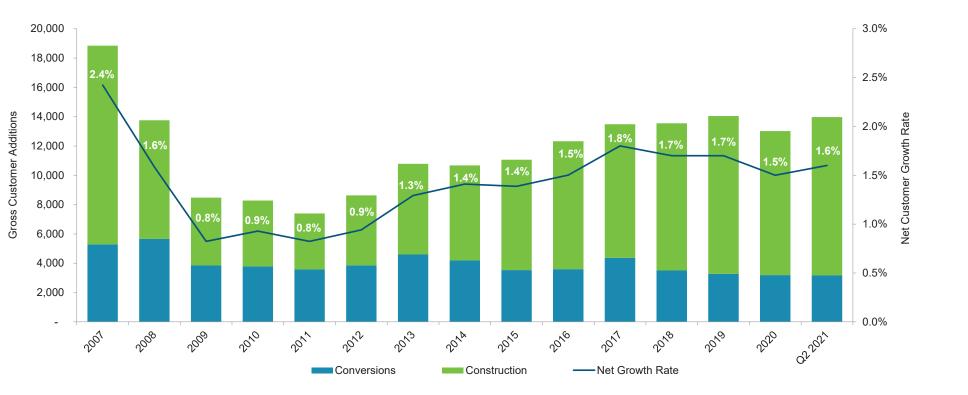
- Growing communities with healthy permitting levels
- · Price advantage of heating with natural gas
 - Up to 65% advantage over electric furnace
 - Up to 15% advantage over high-efficiency heat pumps
- 8 in 10 prospective homebuyers say natural gas is preferable to electricity for heating and cooking¹
- Over 80% of survey respondents would pay \$50,000 more for a median priced home that has gas amenities, relative to an all-electric home¹

Significant Conversion Potential

- Serve approximately 63% of single-family homes in service territory
- About 400,000 potential conversions
- Targeted marketing campaign using innovative, proprietary tool supporting strong conversion pipeline



LEADING IN CUSTOMER GROWTH



NW Natural®

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