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GENERAL COUNSEL DIVISION

April 10, 2024

VIA EMAIL - puc.filingcenter@puc.oregon.gov

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

Re: UG 490 – Staff’s Motion to Modify Procedural Schedule

Enclosed for filing is Oregon Public Utility Commission Staff’s (Staff) Motion to Modify the Procedural Schedule, expedited consideration is requested.

Sincerely,

/s/ Marli Klass

Marli Klass
Assistant Attorney General
Business Activities Section

MK6:pjr
Enclosure

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 UG 490

4 In the Matter of)
5 NORTHWEST NATURAL GAS) STAFF'S MOTION TO MODIFY
6 COMPANY, dba NW NATURAL,) PROCEDURAL SCHEDULE
7 Request for a General Rate Revision.) (Expedited Consideration Requested)

8 In accordance with OAR 860-001-0420, Staff, on behalf of Parties in this proceeding,
9 respectfully request that the Oregon Public Utility Commission (the Commission) issue an Order
10 revising the procedural schedule in this docket.

11 Staff specifically request that the Commission include an Environmental Justice Issues
12 Workshop to be held on April 25, 2024, from 10 AM to 1 PM in this proceeding. This request
13 follows Staff's comments on Procedural Equity, filed in this docket on February 9, 2024.¹
14 Staff's comments contemplated scheduling a Commissioner workshop that centers the
15 perspectives of representatives from environmental justice communities. After learning from the
16 Environmental Justice Issues Workshop in Docket No. UE 426,² Staff is no longer requesting a
17 Commissioner workshop and instead requests that this workshop be focused as a conversation
18 between environmental justice communities' representatives and Northwest Natural Gas
19 Company dba NW Natural (the Company) without the Commission's presence.

20 At this time, priority issues that have been identified by environmental justice
21 representatives include:

- 22 1. Changes to the basic charge
23 2. Northwest Natural's Bill Discount Program, and

24 ¹ *In the Matter of Northwest Natural Gas Company, dba NW Natural, Request for a General Rate Revision*, Docket
No. UG 490, Staff's Comments on Procedural Equity, Feb. 9, 2024.

25 ² *See In the Matter of Idaho Power Company, Request for a General Rate Revision*, Docket No. UE 426, Notice of
26 Special Public Meeting: Commissioner Workshop, Feb. 23, 2024.

3. Oregon Low Income Energy Efficiency Program OLIEE limitations

Staff has conferred with Parties to this proceeding regarding the date and time of this workshop. Staff does not request any other changes to the schedule at this time. Accordingly, Staff requests that the Commission issue an order modifying the procedural schedule in this docket to include an Environmental Justice Issues Workshop on April 25, 2024, from 10 AM to 1 PM. Considering the requested workshop date, Staff requests expedited treatment of this motion pursuant to OAR 860-001-0420(6).

DATED this 10th day of April 2024.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

/s/ Marli Klass

Marli Klass, OSB No. 223244
Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon



Oregon

Tina Kotek, Governor

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April 10, 2024

Subject: Public Utility Commission Staff's Request for Inclusion of Environmental Justice Issues Workshop to UG 490 Procedural Schedule. 503-373-7394

Docket No. UG 490 – Northwest Natural's 2024 General Rate Revision



On February 9, 2024, Staff submitted a proposal to advance procedural equity in this proceeding, which included an experimental Commissioner Workshop, held early in the process, that centers high-priority issues for environmental justice communities.

The Commission hosted a similar Commissioner Workshop in UE 426 Idaho Power's General Rate Revision on March 5, 2024. Staff believes the workshop was a worthwhile learning opportunity and greatly appreciates participants' time and effort. Staff seeks to apply its major learnings from that experience to this proceeding, as described below.

The Commissioner Workshop in UE 426 was successful in understanding parties' main procedural equity concerns, highlighting key issues affecting environmental justice communities, and fostering a dialogue about ways in which the PUC and the Company can build upon the discussion in an actionable manner.

Staff proposed a Commissioner Workshop early in the process to encourage accountability and to set expectations for procedural equity in advance of any relevant settlement discussions. Upon reflection, Staff believes that it may be more efficient to use the workshop for a more substantive discussion with more actionable outcomes for the Company and Staff. Staff proposes the following modification to its initial Commissioner workshop concept:

- **Format:** Staff workshop (no Commission presence)
- **Date and Time:** April 25, 2024 from 10 AM to 1 PM
- **Attendance:** The Company, PUC Staff, Intervenors, and Non-intervenors representing environmental justice communities.
- **Focus:** Centering representatives of environmental justice communities' high-priority issues and concerns.
- **Outcome:** Staff commitment to share documentation of key ideas, areas of agreement, and areas of divergence on the record; utility agreement to explain why it did or did not choose to support requested modifications to its proposals and/or programs in its reply testimony.
 - Based on the discussion, participants in the workshop will also identify the need for additional workshops and issues that will only be discussed for settlement during dedicated times where representatives of environmental justice communities can be present.

If you have questions about the workshop agenda proposal, please contact Michelle Scala, michelle.m.scala@puc.oregon.gov or 503-689-2608.

/s/ Michelle Scala