

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 490

In the Matter of:

NORTHWEST NATURAL GAS
COMPANY

Request for General Rate Revision

PETITION TO INTERVENE OF
FAIR OREGON UTILITY RATES
FOR SMALL BUSINESS

Fair Oregon Utility Rates for Small Business (“FOUR”) petitions the Oregon Public Utility Commission to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information (name, address, email address) of the petitioner is:

Name: Todd Kimball, Board President
Company: Fair Oregon Utility Rates for Small Business (“FOUR”)
Street Address: PO Box 2221
City, State, Zip: Portland, OR 97208
Email Address: president@foursmallbusiness.org
Telephone: 503.960.4683

2a. The petitioner will be represented by counsel in this proceeding. The contact information for petitioner’s counsel to be included on the service list is:

Name: Diane Henkels
Company: Henkels Law LLC
Street Address: 520 SW Sixth Ave. #1010
City, State, Zip: Portland, OR 97204
Email Address: diane@henkelslaw.com
Telephone: 541.270.6001

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2b. Additional contacts to be included on the service list (a petitioner is limited to three contacts on the service list):

Name: Danny Kermode
Company: GDS Associates Inc.
Street Address: 5326 75th Ct SW
City, State, Zip: Olympia, WA 98512
Email Address: Danny.kermode@gdsassociates.com
Telephone: 360.350.9474

Name: Guillermo Castillo
Company: FOUR
Email Address: dockets@foursmallbusiness.org
Telephone: 541.809.8195

3. If the petitioner is an organization, the number of members in and the purposes of the organization:

FOUR is an Oregon registered nonprofit organization with three board members, and many supporters, that represents, protects and promotes the interests of small business utility customers. FOUR holds its primary purposes to be to increase the presence of small business utility customers before regulatory bodies, uplift the interests of small business utility customers, advocate for fair and reasonable utility rates and terms of service for Oregon’s small business, and educate small business customers, utilities, and the government on small business energy behavior and needs.

FOUR is a public benefit nonprofit whose adopted mission is to serve all small businesses in Oregon. There are approximately 60,000 small nonresidential customers served by Northwest Natural Gas Company.¹ Further, FOUR receives financial and advisory support from small businesses and small business focused organizations across the state. Our board members are small business owners themselves, working in the professional services, restaurant, and real estate industries.

4. The nature and extent of the Petitioner’s interest in the proceeding is:

FOUR’s interest in this docket is ensuring small business customers of Northwest Natural Gas Company, and in particular those customers taking service under Rate Schedule 03 (“RS 03”), will receive fair and reasonable rates and terms of service in this ratemaking process.

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¹ UG 490 NW Natural/1801, Wyman 1 Sheet <https://edocs.puc.state.or.us/efdocus/UAA/ug490uaa325928023.pdf>

5. The issues the Petitioner intends to raise at the proceeding are:

FOUR would review general adjustments to revenue requirement as presented in the Company to justify the rate increase, review cost of service especially of the RS 03, and follow up on the RS 3C cost study performed by the Company pursuant to the applicable stipulation in the directly previous rate case;² and may address other issues.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in the proceeding is:

FOUR has special knowledge and expertise to contribute to this docket. FOUR's expert consultant and legal counsel have substantial expertise in utility regulatory matters including a recent rate case with the Company and this same customer class. FOUR's expert has represented Oregon's small nonresidential class in several other Oregon Commission proceedings including general rate cases, and served with the Washington Utilities and Transportation Commission for many years in similar natural gas and electric rate case proceedings. FOUR's counsel has represented small businesses individually for many years, and has represented small businesses collectively as an organization in Oregon and in Commission matters. The expertise in utility rate making and the specialized information regarding this large and diverse customer class of expert and counsel would provide the Commission important particularized information and appropriate recommendation to ensure fair and reasonable rates for all.

7. Based on the information provided above in accordance with the Commission's rules of procedure, we request to participate in this proceeding as an intervenor. Our participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

Respectfully submitted,

Date: March 13, 2024

s/ Diane Henkels

Diane Henkels, OSB #000523
Henkels Law LLC
520 SW Sixth Avenue #1010
Portland, Oregon 97204
t: 541.270.6001 e: diane@henkelslaw.com
Counsel for FOUR Small Business

² UG 435 NW Natural Request for General Rate Revision and Advice 20-19, Schedule 198 Renewable Natural Gas Recovery Mechanism (ADV 1215) (UG 411) Stipulation Regarding Revenue Requirement, Rate Spread and Certain Other Issues, filed May 31, 2022, p11.