



250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

June 28, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attention: Filing Center
201 High Street SE, Suite 100
Post Office Box 1088
Salem, Oregon 97308-1088

RE: UM 1101: Application for Reauthorization to Defer Costs Associated with Intervenor Funding Grants

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), herewith files an Application for Reauthorization (“Application”) to defer costs pursuant to provisions of ORS 757.259 for Intervenor Funding Grants.

A notice concerning this Application will be sent to all parties are participating in the Company’s current consolidated general rate case, UG 435/UG 411. A copy of the notice and a certificate of service are attached to the Application.

Please address correspondence on this matter to me with copies to the following:

eFiling
Rates & Regulatory Affairs
NW Natural
250 SW Taylor Street
Portland, Oregon 97204
Phone: (503) 610-7330
Fax: (503) 220-2579
eFiling@nwnatural.com

If you have any questions, please call me at (503) 610-7051.

Sincerely,

/s/ Kyle Walker, CPA

Kyle Walker, CPA
Rates/Regulatory Manager

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1101

In the Matter of

NORTHWEST NATURAL GAS
COMPANY, dba, NW NATURAL

For Reauthorization to Defer Certain
Expenses or Revenues Pursuant to
ORS 757.259

**APPLICATION FOR
REAUTHORIZATION TO DEFER
COSTS ASSOCIATED WITH
INTERVENOR FUNDING GRANTS**

1 In accordance with ORS 757.259 and OAR 860-027-0300, Northwest Natural
2 Gas Company (“NW Natural” or the “Company”) files this application with the Public
3 Utility Commission of Oregon (the “Commission”) requesting an order reauthorizing
4 the Company to record and defer the cost of intervenor funding grants provided to
5 qualifying organizations pursuant to the provisions of ORS 757.259(3) for future
6 amortization in rates. This request is for the period July 1, 2022, through June 30,
7 2023.

8 In support of this Application, NW Natural states:

9 **A. NW Natural.**

10 NW Natural is a public utility in the State of Oregon and is subject to the
11 jurisdiction of the Commission regarding rates, service, and accounting practices.
12 NW Natural provides retail natural gas service in the States of Oregon and
13 Washington.

1 **B. Statutory Authority.**

2 ORS 757.072(2) authorizes the Commission to approve written agreements
3 for intervenor funding grants between electric and natural gas utilities and qualifying
4 organizations representing broad customer interests. Such grants are used by these
5 qualifying organizations when participating in regulatory proceedings before the
6 Commission. ORS 757.072(3) authorizes the Commission to establish rules with
7 respect to funding agreements for determining which organizations are eligible for
8 financial assistance, the amount of assistance that may be provided, the manner in
9 which assistance will be distributed, and other necessary administrative matters.

10 Moreover, ORS 757.072(4) provides:

11 “The commission shall allow a public utility that provides
12 financial assistance under this section to recover the
13 amounts so provided in rates. The commission shall
14 allow a public utility to defer inclusion of those amounts in
15 rates as provided in ORS 757.259 if the public utility so
16 elects.”

17

18 ORS 757.259(3) provides:

19 “Upon request of the public utility, the commission by
20 order shall allow deferral of amounts provided as
21 financial assistance under an agreement entered into
22 under ORS 757.072 for later incorporation in rates.”

23

24 Additionally, the Company notes that deferred amounts under ORS 757.259(3) are
25 not subject to the percentage of gross revenues limitation on amortization or other
26 provisions of subsections (5), (6), (7), (8), or (10) of ORS 757.259.

27 **C. Background of Request for Reauthorization.**

28 On July 2, 2003, pursuant to Section 2 of the Intervenor Funding Act, the
29 Commission issued Order No. 03-388, which, among other things, approved the

1 Intervenor Funding Agreement among NW Natural, Portland General Electric,
2 PacifiCorp, Cascade Natural Gas Corporation, Avista Corporation, Industrial
3 Customers of Northwest Utilities (“ICNU”), Citizens’ Utility Board (“CUB”), Northwest
4 Industrial Gas Users (“NWIGU”) (collectively referred to hereafter as “Joint Parties”),
5 dated February 5, 2003. The Intervenor Funding Agreement set forth the amount of
6 funding to be contributed by each utility and the procedures for budget submittals by
7 intervenors, Commission approval of budgets, and the payment of grants by utilities.
8 It also established the three funds from which “Intervenor Funding Grants” can be
9 made: CUB Fund, Preauthorized Matching Fund (hereinafter also referred to as the
10 “NWIGU Fund,” because it was for the exclusive use of NWIGU when applicable to
11 NW Natural) and Issue Fund.

12 In its subsequent Order No. 03-405, the Commission directed the utilities to
13 pay CUB the amount made available for the CUB Fund Grants as defined and
14 provided for in the Intervenor Funding Agreement. Express Commission approval
15 for payment was necessitated by Section 7.1 of the Intervenor Funding Agreement,
16 which provides that “upon request by CUB, the Commission will direct the
17 Participating Public Utilities to pay the amounts made available for the CUB Fund.”

18 On December 29, 2007, the Commission issued Order No. 07-564, which
19 approved amendments to the Intervenor Funding Agreement previously approved in
20 Order No. 03-388. In 2012, Joint Parties executed a Second Amended and
21 Restated Intervenor Funding Agreement which the Commission approved in Order
22 No. 12-452. This Second Amended and Restated Intervenor Funding Agreement,
23 effective January 1, 2013, through December 31, 2017, increased the CUB Fund,

1 the Preauthorized Matching Fund (NWIGU Fund), and the Issue Fund by 15 percent
2 above the levels allowed in prior years. The Commission approved the Third
3 Amended and Restated Intervenor Funding Agreement, effective August 1, 2015
4 through December 31, 2017, in Order No. 15-335. The amended Intervenor
5 Funding Agreement increased the Issue Fund amount for NW Natural and for Avista
6 Utilities. NW Natural’s Issue Fund amount was changed from \$66,125 to \$143,750.

7 The Commission approved the Fourth Amended and Restated Intervenor
8 Funding Agreement, effective January 1, 2018 through December 31, 2022, in Order
9 No. 18-017. The amended Intervenor Funding Agreement increased the total funds
10 available annually in the CUB Fund by approximately 45 percent and increased the
11 total funds available annually in the Preauthorized Matching Funds (NWIGU Fund)
12 by approximately 10 percent. In addition, for each Preauthorized Matching Fund
13 (NWIGU Fund), the annual amount for each calendar year after 2018 and during the
14 term of the agreement increases by 3 percent annually. The agreement now allows
15 the Alliance of Western Energy Consumers (“AWEC”)¹ to request payment of
16 Preauthorized Matching Fund Grants semi-annually and lowers the matching
17 amount of internal resources or outside funding from 50 percent to 35 percent.
18 Finally, although the Fourth Amended and Restated Intervenor Funding Agreement
19 expires on December 31, 2022, NW Natural is seeking to re-authorize this deferral
20 until June 30, 2023 because it expects a subsequent intervenor funding agreement
21 to commence on January 1, 2023.

¹ ICNU and NWIGU have merged their organizations and are now AWEC, and the NWIGU Fund now is called the “AWEC Fund.”

1 **D. Communications.**

2 Communications regarding this Application should be addressed to:

3 NW Natural
4 eFiling for Rates & Regulatory Affairs
5 250 SW Taylor Street
6 Portland, Oregon 97204
7 Phone: (503) 610-7330
8 Fax: (503) 220-2579
9 Email: eFiling@nwnatural.com;

10
11 Ryan Sigurdson (OSB #201722)
12 Regulatory Attorney
13 250 SW Taylor Street
14 Portland, Oregon 97204
15 Phone: (503) 610-7570
16 Email: ryan.sigurdson@nwnatural.com;

17
18 and

19 Kyle Walker, CPA
20 Rates/Regulatory Manager
21 250 SW Taylor Street
22 Portland, Oregon 97204
23 Phone: (503) 610-7051
24 Email: kyle.walker@nwnatural.com

25 **E. Description of the Expenses or Revenues for which Deferred**

26 **Accounting is Requested – OAR 860-027-0300(3)(a).**

27 In accordance with the statutory authority provided by ORS 757.259(3) and
28 the Commission's approval of the Fourth Amended and Restated Intervenor Funding
29 Agreement, NW Natural proposes to record and defer the amount of its payment to
30 CUB as directed by Commission Order No. 18-017. This includes any payments
31 made to CUB under a subsequent Commission-approved intervenor funding

1 agreement.² The request is pursuant to the terms of the Fourth Amended and
2 Restated Intervenor Funding Agreement, approved by the Commission in Order No.
3 18-017.

4 Additionally, the Company proposes to record and defer, on an ongoing
5 basis, any and all Intervenor Funding Grants as defined and provided for in the
6 Fourth Amended and Reinstated Intervenor Funding Agreement and any
7 subsequent Commission-approved intervenor funding agreements, for later
8 incorporation in rates. The Company will record and defer these ongoing costs upon
9 payment of the Intervenor Funding Grants following the Commission’s approval of
10 the Intervenor Funding Grant and issuance of an Order directing the Company to
11 make payment, pursuant to the Fourth Amended and Restated Intervenor Funding
12 Agreement or a subsequent Commission-approved intervenor funding agreement.

13 **F. Reasons Reauthorization of Deferred Accounting is Being Requested –**
14 **OAR 860-027-0300(3)(b).**

15 This request is made in accordance with ORS 757.259(3) that allows for the
16 deferral of Intervenor funds, and Commission Order No. 18-017 in docket UM 1929,
17 which directs NW Natural to pay CUB the amounts made available for the CUB Fund
18 Grants as defined and provided for in the Fourth Amended and Restated Intervenor
19 Funding Agreement (\$101,125 for NW Natural).

² As stated above, the Fourth Amended and Reinstated Intervenor Funding Agreement expires on December 31, 2022, and NW Natural is seeking to re-authorize this deferral until June 30, 2023.

1 **G. Accounting – OAR 860-027-0300(3)(c).**

2 NW Natural proposes to record payment of Intervenor Funding Grants in a
3 subaccount of Account 186. In the absence of the Commission’s approval of this
4 Application, the Company would not incur the cost of Intervenor Funding Grants.
5 Were such costs incurred, however, they would be recorded in an appropriate sub-
6 account of FERC Account 401.

7 **H. Estimate of Amounts Subject to Deferral – OAR 860-027-0300(3)(d).**

8 Under the current agreement, the estimated amounts for 2022 are displayed
9 in the table below. The estimated amounts of the Preauthorized Matching Fund
10 (AWEC Fund) will increase by three percent in 2022:

<u>Fund</u>	
CUB Fund	\$ 101,125
Preauthorized Matching Fund (AWEC Fund)	\$ 81,868
Issue Fund	<u>\$ 143,750</u>
Total	<u>\$ 326,743</u>

11 **I. Entries into Deferred Account During Past 12 months - OAR 860-027-**
12 **0300(4)(a).**

13 Attached as Exhibit A to this application are work papers detailing the
14 amounts deferred to date under UM 1101.

15 **J. Reasons for Continued Deferral – OAR 860-027-0300(4)(b).**

16 The Company expects to incur intervenor funding costs for the time period
17 covered by this deferral (July 1, 2022 to June 30, 2023) and ORS 757.072(4)
18 permits the Company to defer such costs.

1 **K. Requirement per Commission Order No. 09-263.**

2 Below is the information required per Commission Order No. 09-263, issued
3 in docket UM 1286, Staff's Investigation into Purchase Gas Adjustment
4 Mechanisms:

- 5 1. **A completed Summary Sheet, the location in the PGA filing, and an**
6 **account map that highlights the transfer of dollars from one account**
7 **to another.**

8 Exhibit A provides the Summary Sheets which show the amounts
9 deferred. Exhibit A will be included in the 2022 PGA filing work papers
10 and in the electronic file entitled "Proposed Temps Oregon 2022-23 PGA
11 filing.xls."

- 12 2. **The effective date of the deferral.**

13 This application is for the 12-month period beginning July 1, 2022 and
14 ending June 30, 2023.

- 15 3. **Prior year Order Number approving the deferral.**

16 Approval to defer costs associated with intervenor funding was last
17 granted under Commission Order No. 21-256.

- 18 4. **The amount deferred last year.**

	Issue Fund	CUB Fund	AWEC Fund
	<u>Acct 186284</u>	<u>Acct 186276</u>	<u>Acct 186278</u>
Deferred amounts July 1, 2021 through May 31, 2022	5,000	\$101,125	\$63,567

1 **5. The amount amortized last year.³**

	CUB Fund	AWEC Fund
	<u>Acct 186286</u>	<u>Acct 186288</u>
Amortized amounts November 1, 2021 through May 31, 2022 with interest	\$137,330	\$51,035

2 **6. The interest rate that will apply to the accounts.**

3 While the Company does not currently accrue interest on balances
4 deferred for intervenor funding, the Company is authorized to include
5 carrying costs in accordance with Section 7.9 of the Second Amended and
6 Restated Agreement included as attachment A to Commission Order No.
7 Order No. 12-452.

8 **7. An estimate of the upcoming PGA-period deferral and/or**
9 **amortization.**

10 The Company estimates that it will defer, and ultimately seek to amortize,
11 up to \$326,743

12 **L. Notice – OAR 800-027-0300(6).**

13 A notice of this Application will be served to parties who are participating in
14 the Company's current consolidated general rate case, UG 435/UG 411, and is
15 attached to this Application.

16 NW Natural respectfully requests that in accordance with ORS 757.259(3), as
17 amended, the Commission authorize the Company to record and defer Intervenor

³ For purposes of amortization, the amount of the Issue Fund deferred related to CUB is amortized in the CUB Fund and the amount of the Issue Fund deferred related to AWEC is amortized in the AWEC Fund.

1 Funding Grants incurred by the Company pursuant to the Intervenor Funding
2 Agreement, as described in this Application.

3 DATED this 28th day of June 2022.

4 Respectfully Submitted,

5 NW NATURAL

6 /s/ Kyle Walker, CPA

7 Kyle Walker, CPA

8 Rates/Regulatory Manager

9 /s/ Ryan Sigurdson

10 Ryan Sigurdson (OSB #201722)

11 Regulatory Attorney

12 250 SW Taylor Street

13 Portland, Oregon 97204

14 Phone: (503) 610-7570

15 Email: ryan.sigurdson@nwnatural.com

16

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of Intervenor Funding - ISSUE FUND
 Account Number: 186284
 Docket UM 1101
 Last deferral reauthorization was approved in Order No. 21-256

1	Debit (Credit)										
2											
3											
4	Month/Year	Note	Deferral-CUB	Deferral-AWEC	Transfers-CUB	Transfers-AWEC	Interest (1)	Activity	Balance-CUB	Balance - AWEC	Balance Grand Total
5	(a)	(b)	(c1)	(c2)	(d1)	(d2)	(e)	(f)	(g1)	(g2)	(gtotal)
6					to 186286	to 186288					
7	Beginning Balance				amort account	amort account					
181	May-21							-	68,010.00	68,113.96	136,123.96
182	Jun-21							-	68,010.00	68,113.96	136,123.96
183	Jul-21							-	68,010.00	68,113.96	136,123.96
184	Aug-21							-	68,010.00	68,113.96	136,123.96
185	Sep-21							-	68,010.00	68,113.96	136,123.96
186	Oct-21							-	68,010.00	68,113.96	136,123.96
187	Nov-21	3			(68,010.00)	(68,113.96)		(136,123.96)	-	-	-
188	Dec-21	2	5,000					5,000.00	5,000.00	-	5,000.00
189	Jan-22							-	5,000.00	-	5,000.00
190	Feb-22							-	5,000.00	-	5,000.00
191	Mar-22							-	5,000.00	-	5,000.00
192	Apr-22							-	5,000.00	-	5,000.00
193	May-22							-	5,000.00	-	5,000.00

183 **History truncated for ease of viewing**

185 **NOTES**

186 **1** - No interest is applied to this activity.

187 **2** - Payment made in:

188 December 2021 - see Order 21-256

189 **3** - Transferred June balances to CUB and AWEC amortization accounts

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of CUB Intervenor Funding
 Account Number: 186276
 Docket UM 1101
 Last deferral reauthorization was approved in Order No. 21-256

1 Debit (Credit)

2

3

4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
181	May-21		-			0.00	101,125.00
182	Jun-21		-			0.00	101,125.00
183	Jul-21		-			0.00	101,125.00
184	Aug-21		-			0.00	101,125.00
185	Sep-21		-			0.00	101,125.00
186	Oct-21		-			0.00	101,125.00
187	Nov-21	2	-	(101,125.00)		(101,125.00)	0.00
188	Dec-21		-			0.00	0.00
189	Jan-22		101,125.00			101,125.00	101,125.00
190	Feb-22		-			0.00	101,125.00
191	Mar-22		-			0.00	101,125.00
192	Apr-22		-			0.00	101,125.00
193	May-22		-			0.00	101,125.00

194

195

196

197 **History truncated for ease of viewing**

198

199 **NOTES**

200 **1** - No interest is applied to this activity.

199 **2** - June balance transferred to account 186286 for amortization.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Deferral of AWEC Intervenor Funding
 Account Number: 186278
 Docket UM 1101
 Last deferral reauthorization was approved in Order No. 21-256

1	Debit	(Credit)					
2							
3							
4	Month/Year	Note	Deferral	Transfers	Interest (1)	Activity	Balance
5	(a)	(b)	(c)	(d)	(e)	(f)	(g)
6							
7	Beginning Balance						
181	May-21		0.00			0.00	11,081.33
182	Jun-21		0.00			0.00	11,081.33
183	Jul-21		0.00			0.00	11,081.33
184	Aug-21		0.00			0.00	11,081.33
185	Sep-21		0.00			0.00	11,081.33
186	Oct-21		0.00			0.00	11,081.33
187	Nov-21	2,3	40,348.95	(11,081)		29,267.62	40,348.95
188	Dec-21		0.00			0.00	40,348.95
189	Jan-22		0.00			0.00	40,348.95
190	Feb-22		0.00			0.00	40,348.95
191	Mar-22		0.00			0.00	40,348.95
192	Apr-22		0.00			0.00	40,348.95
193	May-22	2	23,218.13			23,218.13	63,567.08

194
 195
 196 **History truncated for ease of viewing**

197
 198 **NOTES**

- 199 **1** - No interest is applied to this activity.
 200 **2** - Payments made in:
 201 November 2021 - see Order 21-395
 202 May 2022 - see Order 22-153
 203 **3** - June balance transferred to account 186288 for amortization.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of CUB Intervenor Funding
 Account Number: 186286
 Dockets UM 1101 and UG 422
 Amortization of 2021-22 deferral approved in Order 21-366

1	Debit	(Credit)						
2								
3								
4	Month/Year	Note	Amortization	Transfers	Interest	Interest rate	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
6								
7	Beginning Balance							
196	May-21		(5,253.96)		45.26	2.63%	(5,208.70)	18,071.42
197	Jun-21		(3,812.57)		35.43	2.63%	(3,777.14)	14,294.28
198	Jul-21		(2,214.26)		28.90	2.63%	(2,185.36)	12,108.92
199	Aug-21		(1,946.61)		24.41	2.63%	(1,922.20)	10,186.72
200	Sep-21		(2,242.36)		19.87	2.63%	(2,222.49)	7,964.23
201	Oct-21		(4,639.71)		12.37	2.63%	(4,627.34)	3,336.89
202	Nov-21 old rates		(4,618.46)		2.25	2.63%	(4,616.21)	(1,279.32)
203	Nov-21 new rates (1)		(6,115.42)	169,135.00	171.61	1.24%	163,191.19	161,911.87
204	Dec-21		(22,392.00)		155.74	1.24%	(22,236.26)	139,675.61
205	Jan-22		(31,835.56)		127.88	1.24%	(31,707.68)	107,967.93
206	Feb-22		(25,900.53)		98.18	1.24%	(25,802.35)	82,165.58
207	Mar-22		(21,389.05)		73.85	1.24%	(21,315.20)	60,850.38
208	Apr-22		(16,517.12)		54.34	1.24%	(16,462.78)	44,387.60
209	May-22		(13,900.16)		38.69	1.24%	(13,861.47)	30,526.13

211 **History truncated for ease of viewing**

212
 213 **NOTES**

214 **1** - Transferred in authorized balances from CUB Deferral account 186276 and Issue Fund Deferral account 186284.

Company: Northwest Natural Gas Company
 State: Oregon
 Description: Amortization of AWEC Intervenor Funding
 Account Number: 186288
 Dockets UM 1101 and UG 422
 Amortization of 2021-22 deferral approved in Order 21-366

1	Debit	(Credit)						
2								
3								
4	Month/Year	Note	Amortization	Transfers	Interest	Interest	Activity	Balance
5	(a)	(b)	(c)	(d)	(e1)	(e2)	(f)	(g)
6								
7	Beginning Balance							
180	May-21		(2,158.30)		32.82	2.63%	(2,125.48)	13,930.69
181	Jun-21		(1,980.42)		28.36	2.63%	(1,952.06)	11,978.63
182	Jul-21		(1,986.35)		24.08	2.63%	(1,962.27)	10,016.36
183	Aug-21		(2,094.54)		19.66	2.63%	(2,074.88)	7,941.48
184	Sep-21		(2,058.64)		15.15	2.63%	(2,043.49)	5,897.99
185	Oct-21		(2,299.84)		10.41	2.63%	(2,289.43)	3,608.56
186	Nov-21 old rates		(141.17)		7.75	2.63%	(133.42)	3,475.14
187	Nov-21 new rates (1)		(6,818.37)	79,195.29	78.31	1.24%	72,455.23	75,930.37
188	Dec-21		(7,783.10)		74.44	1.24%	(7,708.66)	68,221.71
189	Jan-22		(7,926.79)		66.40	1.24%	(7,860.39)	60,361.32
190	Feb-22		(7,051.95)		58.73	1.24%	(6,993.22)	53,368.10
191	Mar-22		(7,645.41)		51.20	1.24%	(7,594.21)	45,773.89
192	Apr-22		(7,229.24)		43.56	1.24%	(7,185.68)	38,588.21
193	May-22		(6,988.98)		36.26	1.24%	(6,952.72)	31,635.49

182 **History truncated for ease of viewing**

183

184 **NOTES**

185 **1** - Transferred in authorized balances from NWIGU Deferral account 186278 and Issue Fund Deferral account 186284.



UM 1101

**NOTICE OF APPLICATION FOR REAUTHORIZATION TO
DEFER COSTS ASSOCIATED WITH INTERVENOR FUNDING GRANTS**

June 28, 2022

To Parties Participating in Consolidated Dockets UG 435/UG 411:

Please be advised that on June 28, 2022, Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”), applied for REAUTHORIZATION TO DEFER COSTS ASSOCIATED WITH INTERVENOR FUNDING GRANTS.

This is not a rate case. The purpose of this Notice is to inform parties participating in the Company’s current consolidated rate case, UG 435/UG 411, that a deferral reauthorization has been filed.

Parties who desire more information or who wish to obtain a copy of the filing, or notice of the time and place of any hearing, if scheduled, should contact the Company or the Public Utility Commission of Oregon as follows:

**NW Natural
Attn: Kyle Walker, CPA
250 Taylor Street
Portland, Oregon 97204
Telephone: (503) 610-7051**

**Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, Oregon 97308-1088
Telephone: (503) 378-6678**

Any person may submit to the Commission written comments on this matter within 25 days of the service of this notice. The granting of this deferral reauthorization application will not authorize a change in rates but will permit the Company to defer amounts in rates to a subsequent proceeding.



CERTIFICATE OF SERVICE
UM 1101

I hereby certify that on June 28, 2022, I have served by electronic mail the foregoing NOTICE OF APPLICATION FOR REAUTHORIZATION TO DEFER COSTS ASSOCIATED WITH INTERVENOR FUNDING GRANTS upon parties of record for the NW Natural's current consolidated general rate case, UG 435/UG 411.

UG 435

OREGON CITIZENS' UTILITY
BOARD
dockets@oregoncub.org

WILLIAM GEHRKE
OREGON CITIZENS' UTILITY
BOARD
will@oregoncub.org

MICHAEL GOETZ
OREGON CITIZENS' UTILITY
BOARD
mike@oregoncub.org

TOMMY A BROOKS
CABLE HUSTON LLP
tbrooks@cablehuston.com

CHAD M. STOKES
CABLE HUSTON LLP
cstokes@cablehuston.com

EDWARD FINKLEA
ALLIANCE OF WESTERN
ENERGY CONSUMERS
efinklea@awec.solutions

STEPHANIE ANDRUS
PUBLIC UTILITY COMMISSION
stephanie.andrus@state.or.us

MATTHEW MULDOON
PUBLIC UTILITY COMMISSION
matt.muldoon@puc.oregon.gov

JAMES BIRKELUND
SMALL BUSINESS UTILITY
ADVOCATES
james@utilityadvocates.org

DIANE HENKELS
SMALL BUSINESS UTILITY
ADVOCATES
diane@utilityadvocates.org

DANNY KERMODE
SMALL BUSINESS UTILITY
ADVOCATES
5553dkcpa@gmx.us

JOCELYN PEASE
MCDOWELL RACKNER &
GIBSON PC
jocelyn@mrg-law.com

MCDOWELL RACKNER &
GIBSON PC
dockets@mrg-law.com

ERIC NELSEN
NW NATURAL
eric.nelsen@nwnatural.com

NW NATURAL
efiling@nwnatural.com

JAIMINI PAREKH
EARTHJUSTICE
jparekh@earthjustice.org

KRISTEN BOYLES
EARTHJUSTICE
kboyles@earthjustice.org

ADAM HINZ
EARTHJUSTICE
ahinz@earthjustice.org

CARRA SAHLER
LEWIS & CLARK LAW SCHOOL
sahler@lclark.edu

DATED June 28, 2022, Troutdale, OR.

/s/ Erica Lee-Pella
Erica Lee-Pella
Rates & Regulatory Affairs, NW Natural