BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 435

In the Matter of NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL, Request for a General Rate Revision.) COALITION'S NOTICE OF
) INTENT TO PARTICIPATE IN
) ORAL ARGUMENT

Pursuant to Administrative Law Judge ("ALJ") Spruce's August 2, 2022, Memorandum, Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition") submits this notice of intent to participate in the August 25 oral argument. The Coalition will be represented by Jaimini Parekh (jparekh@earthjustice.org), Kristen L. Boyles (kboyles@earthjustice.org), and Carra Sahler (sahler@lclark.edu). The Coalition will address the following issues:

- 1. Eliminating NW Natural's line extension allowance policy
- 2. Objections to sections (1)(1), (1)(m), and (1)(n) of the First Partial Stipulation on the following topics:
 - Improper use of ratepayer funds to pay for NW Natural's a political activities opposing climate action;
 - b. Charging ratepayers for costs associated with advertising promoting gas appliances with shareholder-financed rebates;
 - c. Improper use of Category A and B advertising budgets to pay for promotional advertising.

The Coalition will rest on the briefs regarding the issue of prudence of the Lexington Facility, and its compliance with SB 98, but counsel for the Coalition will be available to answer any

questions that may arise from the Commissioners or the ALJ on RNG or any of the other above-

referenced topics.

Dated this 12th day of August, 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

<u>/s/ Carra Sahler</u> 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