

CASE: UG 490
WITNESS: MELISSA NOTTINGHAM

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 2200

**Supplemental Opening Testimony
Incremental Public Comments
Received by the Commission**

May 7, 2024

1 **Q. Please state your name, occupation, and business address.**

2 A. My name is Melissa Nottingham. I am the Consumer Services and Residential
3 Service Protection Fund (RSPF) Manager. My business address is 201 High
4 Street SE, Suite 100, Salem, Oregon 97301.

5 **Q. Please describe your educational background and work experience.**

6 A. My witness qualifications statement is found in Exhibit Staff/401.

7 **Q. What is the purpose of your testimony?**

8 A. Consistent with the Commission's Internal Operating Guidelines (IOG) as
9 addressed in Order 20-065 in Docket No. UM 2055, public comments received
10 by the Commission are now made part of the Staff's Opening Testimony in a
11 General Rate Case (GRC). The first round of public comments was included in
12 Staff Opening Testimony Exhibit/Nottingham 402.

13 The purpose of this testimony is to include supplemental public comments
14 received by the Commission since Staff filed opening testimony in Exhibit
15 Staff/2201 inclusive of public comments received during the Commission's
16 virtual Public Comment Hearing on April 16, 2024. Staff are reviewing
17 comments and will address them as practicable in Rebuttal Testimony.

18 Presenting comments at a Commission Informational Hearing or through
19 the Commission's website does not subject the commenting person to cross
20 examination. Any party, though, may respond to Staff's summary of the public
21 comments or the comments themselves in evidentiary testimony.

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1. Summary of Comments

Q. How are public comments obtained by Staff?

A. Comments may be submitted via an online form, an email, a letter, or a telephone call. All comments are submitted and published to the docket's webpage and is available for review at any time. Please see: [NW NATURAL REQUEST FOR A GENERAL RATE REVISION](#).

Q. Please summarize the supplemental public comments received after opening testimony in this rate case.

A. Northwest Natural's request for general rate increase has received 51 additional electronic comments and 11 letters submitted by consumers and various organizations.

Comments both opposed and supported the rate case. Comments opposing the rate case primarily cited affordability of rate increases and impact of gas on long-term decarbonization goals. The supporting comments were dominated by support from builders and chambers of commerce for the Company's proposed modifications to the company's line extension policy. Below is a summary of the common themes in both the letters and electronic comments.

Opposition to Rate Case

Multiple comments reflect concerns about the affordability of services if the rate increases are approved. Commenters often discuss how these increases could stretch their monthly budgets, emphasizing the significant financial impact on households. Some comments directly appeal to the

1 Oregon Public Utility Commission, asking for consideration of the financial
2 burden on customers and urging the commission to take action to mitigate
3 these impacts. Comments also call for greater transparency and justification of
4 the rate increases, with customers wanting more detailed explanations of why
5 increases are necessary and how they will be used.

6 In addition to the financial impact of increased rates on individual
7 consumers, commenters express strong opposition to rate increases
8 particularly when these increases are perceived as supporting practices that
9 may be environmentally detrimental or not aligned with decarbonization goals.
10 With a call for greater environmental responsibility, commenters seek
11 assurances that any rate increases are justifiable within the broader context of
12 environmental impact and sustainability goals. Commenters also discuss the
13 personal impact of environmental policies, reflecting on how these policies
14 affect their daily lives and financial situations, particularly in the context of utility
15 costs and environmental stewardship.

16 **Supportive of Rate Case**

17 Home builders support NWN's filing due to the modifications to the line
18 extension allowance. Builders state the new allowance will help control initial
19 construction costs, provides energy options to homeowners, and supports
20 broader housing market goals by making homes more affordable and
21 appealing. Home builders argue that the line extension allowance supports
22 land development by making it feasible to include gas services, which are
23 perceived as less expensive initially compared to electrical installations. This is

1 seen as particularly beneficial for keeping construction and subsequent home
2 costs down, making housing more affordable.

3 **Q. What issues were raised during the Public Comment Hearings?**

4 A. During the April 16, 2024, Public Comment Hearing, the forty comments also
5 provided support and opposition to UG 490 with 16 comments supporting
6 Northwest Natural and 24 comments opposed to the rate case.

7 • Home builders argue that the line extension allowance supports land
8 development by making it feasible to include gas services, which are
9 perceived as less expensive initially compared to electrical installations.

10 This is seen as particularly beneficial for keeping construction and
11 subsequent home costs down, making housing more affordable.

12 • Several comments highlight the importance of providing home buyers
13 with energy choices, particularly the option to use natural gas for heating
14 and cooking. Participants emphasize that natural gas is a preferred
15 option for many homeowners due to its efficiency and reliability during
16 power outages, thus enhancing energy resilience.

17 • The line extension allowance is viewed as crucial for maintaining a
18 competitive and diverse housing market. By offsetting some
19 infrastructure costs, the allowance helps to diversify the energy options
20 available in new homes, which can attract more buyers and support the
21 local housing market.

22 • Commenters argue against the rate increase because it allegedly
23 supports the expansion of a gas system that is harmful to public health

1 and the environment. There are concerns about toxic emissions from
2 gas appliances and the broader impact of methane as a potent
3 greenhouse gas.

- 4 • The rate increase is seen as particularly harmful to financially burdened
5 households, which would face higher costs that could restrict their ability
6 to pay for basic needs like housing, food, and healthcare.
- 7 • Opponents emphasize the urgent need for climate action, criticizing the
8 utility for not aligning its practices with state climate goals. The focus is
9 on the necessity to transition away from fossil fuels towards
10 electrification and other cleaner technologies.

11 **Q. Are any of these issues addressed in Staff's Opening Testimony?**

12 A. Yes. While many comments focused on energy policies on decarbonization,
13 public health, resiliency, and electrification, other issues are addressed in the
14 following staff testimony.

15 In Exhibit 300, Michelle Scala, Energy Justice Program
16 Manager, discusses the impact of rate increases on energy
17 justice communities.

18 In Exhibit 900, R. Christopher Dlouhy, Ph.D. analyzes the
19 Company's Climate Protection Program, and Line Extension
20 Policy.

21 In Exhibit 1200, Charles Lockwood, Utility Analyst,
22 analyzes the Company's low-income program.

23 In Exhibit 1900, Dr. Bret Stevens, Ph.D. analyzes the

1 Company's load forecasting.

2 **Q. Does this conclude your testimony?**

3 A. Yes.

CASE: UG 490
WITNESS: MELISSA NOTTINGHAM

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 2201

**Supplemental Opening Testimony Incremental
Public Comments Received by the
Commission**

May 7, 2024

Chair Decker and Commissioners Tawney and Les Perkins,
Thank you for the opportunity to testify today.

My name is Linda Kelley and I currently volunteer with 350 Eugene whose focus is on climate problems and solutions. I have formally worked with Bay Area Air Quality Mgmt. District in their Source Testing Lab.

I am testifying today to request that the Commission reject the utility's efforts to use rate payer dollars in support of their investments in projects like renewable natural gas and green hydrogen. While there can be some limited use for these operations, they must not include any expansion of the gas system.

Fossil fuel investments are not in the public interest and the financial risk to ratepayers is quickly becoming well recognized. The head of the EU environmental Agency, the European Central Bank and our US Treasury Secretary have all warned of growing potential of systemic financial shock due to unjustified valuations of fossil fuel stock and the costs of disasters due to a rapidly changing climate.

The fossil fuel industry like all businesses must be able to adapt or perish in an American economy. There are projects currently in development and in operation that offer another pathway for their business participation.

Repurposing gas lines to carry geothermal energy in neighborhoods and acting as conduit for some larger long distance electrical lines with the added benefit of protection from forest fires. Our Building resilience Bill package from 2023 will create mandates and incentives for clean sourced energy efficiency.

Meta and Google – who combine ambitious climate commitments and ravenous demand for electricity to run their data centers – are beginning to favor geothermal energy for safe base-load abundant electricity.

The climate mandate and financial opportunities exist. Please ensure that you create the rules that will further ensure that the fossil fuel industry will leave behind a culture of denial and move forward and find a place in the new energy economy.

Thank you for accepting my testimony.

Linda Kelley Coordinator, 350 Eugene

April 16, 2024

Chair Decker, Commissioner Tawney, and Commissioner Perkins:
(Public Comment in NWN UG 490 general rate case)

The Washington County Chamber of Commerce strongly supports NW Natural's line extension proposal, which we believe is essential for fostering economic development and enhancing community well-being in our region, while focusing on decarbonizing the energy system and protecting resiliency for residents.

Washington County is a vibrant community with growing residential and business needs. NW Natural's innovative proposal to enable the building community to affordably deliver housing with resilient energy systems will significantly benefit our local businesses by providing residents with reliable, cost-effective energy options that are crucial for daily operations and long-term planning. This proposal is not merely an enhancement of resiliency; it is an investment in the economic foundation of our county.

Moreover, this project aligns with our commitment to sustainability and responsible resource management. Natural gas plays a pivotal role in our transitional energy strategies, helping us balance economic growth with environmental stewardship, while ensuring that the energy that residents depend on is available, even during extreme weather events. By supporting this proposal, we are endorsing a vision that promotes growth, reliability, and sustainability vision that is integral to the future of Washington County.

Therefore, I urge the Commission to consider the substantial positive impacts this project will have on our community and to approve NW Natural's line extension proposal.

Thank you for your attention and consideration.

Deanna Palm President/CEO

Good evening,

My name is Jeremy Osterholm. I am the 2024 Board President for the Home Building Association of Greater Portland. I am also the owner and President of Ostercraft Homes Inc. I am a second-generation homebuilder in the Portland metro area.

I come before you today in support of the NW Natural Gas Line Extension Agreement (LEA) proposal. The Home Building Association of Greater Portland also known as the HBA is dedicated to maximizing housing choice for all who reside in our region. Our members are industry professionals across the Portland Metro Region in six counties, 40 cities, and many more service and utility districts.

Our members have been heavily involved and working with Governor Kotek, this last year, on housing growth and housing affordability initiatives that she has successfully proposed. The recent trend of reducing the LEA with the end goal of eliminating it plays against affordable housing.

For years the LEA has provided our members and communities around the region with a viable option to have multiple energy sources in homes. Without the LEA, builders will continue to provide natural gas to homes, but the consumer will ultimately pay more for this product increasing the cost of housing.

However, the current proposal presented by NW Natural provides an incentive to not only provide natural gas as an option, but also incentivizes builders to use more energy efficient equipment in the homes they build. This is a win for housing affordability and for the environment.

As a second-generation home builder, my family has been building homes in the Oregon since 1974. I can proudly say in our 50 years of building we have been installing natural gas to our homes. It has been an amenity and an asset for our home buyers.

As a small company we work daily to try and find a way to lower the cost of our homes so that we can compete in today's market. We are also always trying to anticipate what the next generation of consumer is going to want in their homes. Considering massive power outages in the last few winters, our consumers are making sure that we can provide Natural gas as well as power so that they can have options when they are out of power during these winter storm events.

They are also asking for energy efficient products. The new LEA proposal from NW Natural will make it easier for me to provide my customers with energy efficient products and help keep my costs in check. I have read through NW Natural's proposal, and I am not only in support of it, but I am also thankful that they have answered the call to serve our industry's growth, while lowering emissions.

Please take my testimony into account and approve this proposal. Thank you,

Jeremy Osterholm, Board President
Home Builders Association of Greater Portland
April 16, 2024



April 12th, 2024

Public Utility Commission of Oregon
cc: Charles Lockwood, PUC Staff
201 High St. SE #100
Salem, OR 97301

RE: OPUC Consideration of LEA General Rate Case Filing (UG490) to Support Decarbonization

Dear Oregon Public Utility Commissioners,

My name is Preston Korst and I'm the Director of Government Affairs at the Home Building Association of Greater Portland. The HBA is dedicated to maximizing housing choice for all who reside in our region by shaping an environment in which industry professionals can effectively meet the diversified needs of all communities. Together, our 1,200 members work across the Portland region in 6 counties, 40 cities, and in many more service and utility districts.

We are writing in support of a collaborative proposal filed by NW Natural to create the country's first residential Line Extension Allowance (LEA) program supporting both housing production objectives and energy grid decarbonization.

This reasonable LEA proposal will:

- **Lower severe swings to existing LEA requirements**, ensuring that homebuilders have a more stable development environment in a regulatory and capital market that is volatile enough.
- **Allow for the installation of important residential infrastructure** that can deliver reliable natural gas now, and could be used to transport important amounts of clean energy sources, such as Renewable Natural Gas (RNG) and blended hydrogen.
- **Retain customer choice and energy resiliency** while positioning NWN customers and the utility systems for a low carbon compliance environment.
- **Provide incentives for new technologies** that are emerging from the market that previous models did not account for, including hybrid space heating solutions.

HBA members have deep experience in bringing energy efficiency and sustainable designs to the homes they build. Given the dual crises of climate change and a housing supply shortage, we urge policy makers to nurture cost-effective and diverse energy programs that help bring new homes to market while making older homes healthier and more efficient. Together, we should search for innovative policy strategies that generate affordably for working families and create valid tools to decarbonize our energy grid. Therefore, we appreciate when public policy is carefully developed to achieve both of these worthy

objectives—especially when Oregon is staring down an existing housing deficit of 140,000+ units, and will need 443,000 new homes built over the next 20 years.

Homebuilders are often encouraged to think not just about the first family that moves into a newly built home, but for the next 5 families. Today's modern building standards and high-performance building codes mean that products built today will exist for at least the next 100 years. As a society, we should ensure that homes built today have the basic infrastructure installed to accommodate for a future energy market we can't even imagine today. New technologies and energy solutions will emerge and we should not rush to eliminate infrastructure that may be essential in solving our climate crisis or housing affordability crisis, while simultaneously protecting our resiliency during extreme weather events.

We encourage you to approve this proposal from NW Natural that prioritizes housing affordability and bends towards a cleaner and more efficient energy grid. We are certain that this policy change will result in a more sustainable future, reliable energy supply, and reduced impacts on our environment.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Preston Korst", is written over a light gray rectangular background.

Preston Korst

Director of Public Policy and Government Affairs
Home Building Association of Greater Portland
15555 Bangy Rd, Lake Oswego, OR 97035
Email: prestonk@hbapdx.org
Phone: 503-684-1880

To: Chair Decker and Commissioners Tawney and Perkins, Oregon PUC
From: The Board of Directors, Lake Oswego Sustainability Network (LOSN)
Re: NW Natural General Rate Case, Docket # UG 490 – Please Reject
Date: April 16, 2022

I appreciate the opportunity to send written testimony about a critical issue. On behalf of the Lake Oswego Sustainability Network, I urge you to reject NW Natural's rate proposal.

Specifically, we are urging you to reject all subsidies for the line extension allowance. To meet state climate targets, we need to reduce and eventually eliminate the use of natural gas, which is composed of methane, a potent greenhouse gas. The NW Natural rate proposal includes expenditures that go in the opposite direction.

We are already experiencing unhealthy, expensive, and dangerous effects of climate change. During the summers we are beset by fires that harm our forests and our air. We have suffered from heat surges and droughts. As greenhouse gasses accumulate in the atmosphere, scientists predict that our climate will get worse. Policymakers in Oregon take this very seriously; we must make the hard choices to meet our goals.

LOSN is a volunteer-based sustainability group in Lake Oswego. We work to promote a clean and safe environment for future generations by helping local residents reduce their use of toxics and fossil fuels. We have a thousand people on our mailing list, and many hundreds of people attend our events and work with us on a multitude of projects. We host a program, "Electrify LO" which helps our citizens switch to low carbon options such as electric vehicles, heat pumps, induction stoves and more.

Polling done by the chamber of commerce and the city of Lake Oswego shows that climate change and sustainability are among top concerns for Lake Oswego residents. As much as individuals can do locally, state policies are imperative to change our system. Please build on your own guidance from the NW Natural's integrated resource plan by directing the utility to pursue electrification, which is the only feasible, proven path to meeting its decarbonization obligations under state policy.

NW Natural's proposal is to increase its ratepayer-funded subsidies for many new gas connections. Our state needs to end this outdated, expensive, and climate-damaging approach.

Thank you for your consideration.

Lisa Adatto, Board Member On behalf of The LOSN Board of Directors
ladatto3@gmail.com



Public Comment Re: 1) NWN UG 490 General Rate Increase and 2) NWN Purchase Gas Adjustment (PGA) as well as 3) PGE UE 435 General Rate Increase

I'm strongly concerned about the rate increase for residential customers being pursued by Northwest Natural in their current rate case (UG 490) of over 18%. If approved, residential customers since 2020 will face utility bill increases of over 50%, a punishing and regressive "tax increase" that is straining household budgets across our state. In reviewing the commodity price for natural gas on the U. S. Energy Administration website, I see that futures prices are now back to recent historic lows of under \$2.00 per million British thermal units, which is a relief for all natural gas customers. Rather than debating higher prices for consumers, we should be having a robust conversation about lowering prices for customers back to rates prior to the pandemic (when the commodity price for natural gas was consistently hovering at or below \$2.00 MMBtu), while still allowing for future investment in Northwest Natural's key infrastructure. In fact, the EIA can be quoted on 4/17/24 as stating "The Henry Hub spot price fell 38 cents from \$1.88 per million British thermal units (MMBtu) last Wednesday to \$1.50/MMBtu yesterday." Please consider the impact a price increase would have on all families and businesses across our state, and factor in the current price of the commodity, as well as the futures trending price into the Purchased Gas Adjustment analysis of this docket. Oregonians are asking for stable and predictable energy prices, not year over year increases that are making their utility bills unaffordable.

In addition, the Oregon Electricity Mix, listed at <https://www.oregon.gov/energy/energy-oregon/pages/electricity-mix-in-oregon.aspx> shows that from 2012 to 2021, electricity delivered across Oregon generated by natural gas more than doubled to 24.46%. Please consider the second order impact increased costs for natural gas cause; potentially leading to increased electricity costs for consumers as well since approx. 25% of Oregon's electricity is now generated by natural gas. As a PGE customer, I have seen multiple electricity rate increases over the past few years that have completely erased any gains made from my conservation and energy efficiency investments. These PGE rate increases now total over 37% since 2020, with PGE requesting another 7.4% rate increase to take effect 1/1/2025. These rate increases are the cruelest of all since they take the form of being regressive, and far exceeding the cumulative rate of inflation over the same time period.

Please consider a cap on price increases that Northwest Natural may receive as you conduct your detailed analysis, taking into account the actual cost of natural gas in the marketplace. Customers should feel confident that as market conditions change, the falling price of natural gas as a commodity should be passed along to them in the form of lower utility bills. If Northwest Natural's proposed rate increase is approved, customers will now face over a 50% increase in their residential natural gas utility bill since 2020, even as the Henry Hub price for natural gas is now lower than it was for the same time period in 2020.

Thank you for your consideration.

Sincerely,

Matt Hale
Salem, OR



Testimony to Oregon Public Utilities Commission

Northwest Natural's General Rate Case

April 16, 2024

Chair Decker and Commissioner Tawney and Perkins, thank you for the opportunity to testify today.

My name is Dr. Pat DeLaquil, and I am an energy system modeler and climate policy analyst. I am submitting this testimony on behalf of MCAT (Mobilizing Climate Action Together), which is a community of about 500 volunteers working on advancing a healthy climate and a green economy for future generations.

As I have testified to you during the recent NWN IRP docket, multiple reports from multiple groups studying potential long-term decarbonization pathways have consistently identified four core strategies to the most cost-effective and economically beneficial pathway:

1. Achieving 100% clean electricity generation
2. Converting our transportation fleets to electric vehicles
3. Converting our buildings and industry (where feasible) to electricity, and
4. Developing carbon-free fuels for long-term storage, reliability and hard to electrify applications.

These reports cover studies at the global regional and national levels, and were developed by organizations, such as the Intergovernmental Panel on Climate Change¹, the International Energy Agency², the Center for Strategic and International Studies³, and even people like Bill Gates⁴.

Unfortunately, NWN continues to promote the false promise to decarbonize its gas grid through biomethane, hydrogen and synthetic methane. The fact is that this gas decarbonization pathway has been repeatedly proven to have higher costs and greater technical risks compared to proven technologies for electrification – especially for space and water heating services in our buildings. Biomethane is a temporary and limited solution, hydrogen is dangerous and costly, and carbon-neutral synthetic methane is a pipe dream.

We should be discussing how we can gracefully age-out of our existing gas infrastructure in a way that maintains both the viability of the public utility and affordability for its end-of-life customers. Instead, we are here to resist the Company's efforts to sell its false promises.

In our opinion, NW Natural is not acting in the public interest and does not deserve an increase in its profit margins. Also, it also makes no sense to continue subsidies to any fossil fuel infrastructure, nor should we be incentivizing new buildings to connect to the gas system.

¹ Sixth Assessment Report: Working Group III: Mitigation of Climate Change - Summary for Policymakers, 2022

² [Net Zero by 2050 – Analysis - IEA](#)

³ <https://www.csis.org/analysis/climate->

⁴ How to Avoid a Climate Disaster, Bill Gates, Knopf, 2021, p154.

Finally, we shouldn't be governed by the past solutions. Low housing costs will mean nothing if we continue to ignore the climate crisis, especially with the escalating cost of gas and which saddles low-income customers with high bills and questionable redundancy.

We urge the Commission to not allow any portion of this rate request.

MCAT Steering Committee

Brett Baylor, Rick Brown, Linda Craig, Pat DeLaquil, Dan Frye, Debby Garman, KB Mercer, Michael Mitton, Rich Peppers, Rand Schenck, Jane Stackhouse, Joe Stenger and Catherine Thomasson



April 23, 2024

Public Utility Commission of Oregon
201 High St. SE, Suite 100
Salem, Oregon 97301-3398

**Re: UG 490 – Multnomah County Office of Sustainability’s Comments on
Northwest Natural’s Request for a General Rate Revision**

Dear Chair Decker and Commissioners Perkins and Tawney,

Multnomah County Office of Sustainability offers these comments to encourage you to reduce Northwest Natural’s requested increase to the minimum possible while conserving aspects of the proposal that serve energy-burdened communities. Our community already experiences high energy burden rates, even before the steep increases that they have seen in their Northwest Natural bills over the last few years.¹ As a result, we encourage you to reject various specific elements of Northwest Natural’s proposal and to look closely at other elements that can reduce the impact of this rate case.

Our requests and advocacy in this docket are guided by our Office’s environmental and energy justice priorities. Multnomah County has strong greenhouse-gas-emission-reductions and renewable-energy goals.²³ Energy use in buildings is responsible for a significant portion of our emissions,⁴ with electricity and gas as the main sources of that energy. HB 2021 sets emissions reduction requirements for the electric utilities that serve Multnomah County. In contrast, Northwest Natural currently faces no emissions reduction requirements,⁵ although we expect to

¹ Oregon Department of Energy, *Multnomah County, Oregon 2020 Energy Profile* (Nov. 1, 2020), available at <https://energyinfo.oregon.gov/2020-counties/2020/11/1/multnomah-county>

² Multnomah County and the City of Portland, *Climate Action Plan* (Jun. 2015), (maintains 2009 goals of “reducing local carbon emissions by 80% from 1990 levels by 2050, with an interim goal of 40 percent by 2030.”), available at https://multco-web7-psh-files-usw2.s3-us-west-2.amazonaws.com/s3fs-public/CAP2015_june2015_web.pdf.

³ With Resolution 2017-046, the Board adopted the goal of meeting with renewable energy 100% of our community-wide electricity needs by 2035 and energy needs by 2050.

⁴ City of Portland, Bureau of Planning and Sustainability, *Summary of 2021 Multnomah County Carbon Emissions and Trends* (July 2023) at 9, available at <https://www.portland.gov/bps/climate-action/documents/multnomah-county-2021-carbon-emissions-and-trends/download>.

⁵ Gosia Wozniacka, *The Oregonian*, *Oregon court strikes down state climate program, rules in favor of utilities, industry* (Dec 23, 2023).

<https://www.oregonlive.com/environment/2023/12/oregon-court-strikes-down-state-climate-program-rules-in-favor-of-utilities-industry.html>

see requirements back in place in the not-too-distant future.⁶ Our Office also has policy direction to center environmental and energy justice communities in our work.⁷ As a result, we prioritize engagement on issues that disproportionately impact low-income and other environmental justice communities, like the disconnections rulemaking, the design of existing bill discount programs, and, as our capacity allows, rate cases.

At a high level, we are concerned about the impacts of Northwest Natural's 17.8% requested increase for residential rates, on top of the rate hikes of almost $\frac{1}{3}$ that customers have experienced since 2022.⁸ We encourage you to carefully scrutinize Northwest Natural's proposal to reduce any rate increase you may grant to the minimum among possible. We also offer the following specific recommendations:

- 1) Reject the Company's proposed increase in its return on equity

Northwest Natural proposes an increase in its return on equity to 10.1%,⁹ a figure outside the range that Staff finds reasonable in this docket.¹⁰ The impact of that proposal concerns us in light of the utility's rate increases to date. Additionally, Northwest Natural's request is high compared to the 9.5% stipulated in the Avista rate case that this Commission approved less than a year ago.¹¹ It is important to note that the Citizens Utility Board raised concerns about the Avista stipulated return on equity although it was much lower than Northwest Natural's proposal.¹² For these reasons, we encourage you to reject Northwest Natural's proposed return on equity.

- 2) Reject the company's proposal to expand incentives for gas infrastructure in new buildings while adopting a steep increase to the fixed charge for new residential customers

Northwest Natural proposes a new line-extension allowance ("LEA") structure that would offer

⁶ Gosia Wozniacka, *The Oregonian*, *Oregon seeks redo on signature Climate Protection Program invalidated by court ruling* (Jan 23, 2024), available at <https://www.oregonlive.com/environment/2024/01/oregon-seeks-redo-on-signature-climate-protection-program-invalidated-by-court-ruling.html>.

⁷ With Resolution 2017-046 the Board set a target of supplying 2% of community-wide energy needs via community-based renewable energy infrastructure by 2035, committed to pursuing "additional policies and partnerships to include low-income residents in the economic, social, and environmental benefits to be derived from the clean energy transition," resolved to "prioritize recruitment from within communities of color and women that have traditionally been underrepresented in renewable energy and energy efficiency fields, and in the workforce needed to implement a successful renewable energy transition," and resolved to "partner with Oregon tribes and native communities, communities of color, and low-income communities to address environmental, economic, and social inequities."; Resolution 2018-018 supports direction to our office to "[a]pply a lens of environmental justice in all relevant areas of its work, and continually search for opportunities to improve County practice to better align with the principle of environmental justice."

⁸ Bob Jenks, Citizens Utility Board of Oregon, *Is Oregon Utility Regulation Part of the Problem?* (Jan. 25, 2024), <https://oregoncub.org/news/blog/is-oregon-utility-regulation-part-of-the-problem/2944/>.

⁹ NW Natural's Executive Summary at 3.

¹⁰ Staff/100 Muldoon/17-18.

¹¹ Docket No. UG 461, Order 23-384 at 3 (Oct. 26, 2023).

¹² *Id.*

higher levels of allowance the lower the expected usage. We question how this proposal to offer higher LEAs to customers with the lowest expected usage can be consistent with the traditional principle underlying the LEA: that incentivizing new customers benefits existing customers because costs can be spread among a higher number of customers and terms.

We also find this LEA proposal especially concerning in light of the proposal to more than double its fixed charge for new residential customers.¹³ The LEA proposal would incentivize the construction of housing that relies on gas, while those who will live in that housing would face the steep fixed-charge increase. The overwhelming majority of those people would not have a say over whether they would be subject to a steeply increased portion of their bill that they could not mitigate with energy efficiency measures or by limiting their energy use.

Northwest Natural's fixed charge proposal also lacks an energy justice framework and a targeted attempt to minimize its impact on energy-burdened communities. While the company points to a \$2 discount for multifamily owners, this discount would apply across the board. In other words, Northwest Natural's proposal lacks components that would mitigate its impacts on energy-burdened communities

- 3) Approve increases to discount levels for Northwest Natural's low-income customer discount plan while signaling that utilities should consider procedural justice in their choice of forum for issues that impact environmental justice communities.

We strongly support strengthening the discount program that Northwest Natural proposes, and encourage the Company to engage with energy justice stakeholders to finalize specific discount levels. However, we are disappointed by the Company's decision to address the evolution of this program in a rate case, and by its limited engagement of the many stakeholders who worked on HB 2475 and its implementation. This decision does not advance procedural justice as it limits participation and discussion on the final program details to entities with the capacity and resources to intervene in a rate case. We appreciate efforts by Energy Justice Staff to attempt to address that reality through the creation of environmental justice workshops, and we encourage the Company to fully engage in those workshops. We also encourage the Commission to signal to utilities that they should consider procedural justice when determining the type of process in which they address issues with impacts on environmental justice communities.

To close, we appreciate your consideration of our comments and encourage you to center energy justice voices and perspectives as you consider issues in this docket, as well as any stipulations.

Respectfully submitted this 23rd of April 23, 2024,

/s/ Silvia Tanner

Silvia Tanner

Senior Energy Policy and Legal Analyst
Multnomah County Office of Sustainability

¹³ NW Natural/1800 Wyman/Page 78.

April 19, 2024

Chair Decker, Commissioner Tawney, and Commissioner Perkins:

President

Erik Andersson

2023-2024**Executive Council****Chair**Kate Schwarzler
Indy Commons**Vice-Chair**Ryan Allbritton
Willamette Valley Bank**Secretary/Treasurer**Tim Murphy
DCI**Past Chair**Mike Keane
Garrett Hemann Robertson**Members at Large**Michael Fowler
Cabinet Door ServiceTony Schacher
Salem ElectricScott Snyder
The Grand Hotel in SalemKeith Stahley
City of SalemColm Wills
Marion County
Commissioner

The Strategic Economic Development Corporation (SEDCOR) shares our support for the Line Extension Allowance proposal from NW Natural. This Line Extension Allowance will provide the Mid-Willamette Valley region with a valuable resource which will help to attract and retain the traded sector businesses that are vital to our economy.

SEDCOR is a nonprofit, regional economic development organization, working with private and public partners to enhance and diversify the Mid-Willamette Valley economy. As such, we are always seeking ways to improve opportunities to attract new businesses and support existing business growth. This Line Extension Allowance is in alignment with the strategic priorities upon which SEDCOR operates. SEDCOR supports healthy businesses, good jobs, and strong communities by finding, creating, and cultivating economic opportunities in Oregon's Willamette Valley.

To carry any project across the finish line involves an expansive and intricate network of passionate people with a shared vision. Since 1982, SEDCOR has built and strengthened positive and productive partnerships with industry leaders, utility providers, nonprofits, business advocacy groups, community organizations, commodity boards, state and federal agencies, local governments, and more. That is why we are reaching out today to share our support for the Line Extension Allowance proposal from NW Natural.

SEDCOR sees two significant and directly related Economic Development benefits to this proposal.

Housing Availability: This first-of-its-kind approach prioritizes low emission homes while balancing the need for housing growth in our state in a way that supports more affordability in building costs and energy security. As an economic development organization, we have heard time and again that access to workforce housing is a significant barrier to finding and retaining employees in traded sector work. When we see policies which aid in the growth and availability of accessible housing in our region, we feel obligated to share our voice on the matter.

Business Expansion and Recruitment: It is not uncommon for SEDCOR to receive inquiries from businesses looking to expand existing operations, but where utility infrastructure challenges are a limiting factor. Likewise, when we receive recruitment inquiries, we must focus on areas where utility infrastructure can meet the needs of the business in question. This can limit our scope, which limits the potential for the region. NW Natural's Line Extension Allowance will provide the necessary growth of utility infrastructure into regions of our state that are ideal for economic development.

We urge this commission's support and approval of NW Natural's Line Extension Allowance Proposal and hope that you will consider these economic development and community impacts alongside the additional messages of support received for this proposal.

Thank you for your time and consideration.

Sincerely,



Erik Andersson, President

Southern Oregon Climate Action Now

SOCAN

Confronting Climate Change

<https://socan.eco>

Alan R.P. Journet Ph.D.
Cofacilitator
Southern Oregon Climate Action Now
alan@socan.eco
541-500-2331
April 17th 2024

Reference Northwest Natural Gas Request for a Rate Hike

Chair Decker; Commissioners Tawney and Perkins,

Thank you for providing the opportunity to offer oral comments on this proposal yesterday evening. This is a follow-up regarding comments offered during that session.

I appreciate that it is difficult to serve as arbiters of an issue when witnesses are offering testimony that is simply untrue. In my previous testimony, I made the case that Northwest Natural Gas has exhibited an ongoing pattern of offering claims to the PUC and in its marketing that are based on misinformation and disinformation. Apparently, some of the builders and their association representatives have adopted similar tactics. Some of these claims deserve a response.

I will readily acknowledge that there are probably many Oregonians who prefer to have the option of including both gas and electricity in their homes. There are also many Oregonians who still have a habit of smoking even though the negative health effects of this habit are well understood. The fact that folks have a preference for behaving in a way that threatens their own health, does not mean this should be supported and exempt from agency rules and regulations. Indeed, in an effort to protect those who recognize the health hazards of second-hand smoke, there are many restrictions limiting where Oregonians can smoke. By the same token, it makes perfect sense that the PUC, acting as the arbiters of what best serves Oregonians, should take into consideration the health impacts of natural gas for users, and the long-term climate impacts of the greenhouse gas emissions that result from gas usage.

I was particularly disturbed by the consistent claim from builders that gas is a clean fuel when the evidence that its use compromises the health of inhabitants of homes served by gas is abundant (e.g., Gottlieb and Dyrzka 2017; Bushkin-Bedient et al. 2019; O'Rourke et al. 2022). That gas offers a very efficient source of instant heat for cooking I do not challenge. However, it is an obvious act of dissembling to ignore the fact that induction cooktops powered by electricity are at least as effective at providing instant heat as gas-powered appliances.

The claim that promoting gas constitutes a social justice issue is another false claim. Indeed, as Sabadosa (2023) concluded, all-electric homes are far cheaper to construct, and thus will cost the buyer less. This author also reports: "Not only are all-electric homes cheaper to build, they reduce monthly energy bills thanks to the incredible efficiency of appliances such as heat pumps." This echoes a report from RMI (McKenna et al. 2020) that concluded "In every city we analyzed, a new all-electric, single-family home is less expensive than a new mixed-fuel home that relies on gas for cooking, space heating,

and water heating.” Indeed, NBI (2022) concluded that “The all-electric single-family home is \$7,500-\$8,200 cheaper to construct than the baseline code home.” In terms of lifecycle comparison, they concluded “The all-electric scenario reduced total energy consumption by 34%...”

A common refrain was that in a power outage gas appliances are necessary. However, as the Citizens Utility Board (Shuff 2020) noted for power outages: “While natural gas can still flow into your home during a blackout, many appliances still require power to operate.” Those promoting mixed energy sources rarely acknowledge this limitation. Meanwhile, in a comparison between heat pumps and gas furnaces Muro (2024) noted that heat pumps both heat and cool, while those with gas furnaces also need air conditioning and concluded: “heat pumps do not just outperform gas furnaces in energy efficiency, they also hold the upper hand in terms of cost-effectiveness, carbon footprint, and longevity.” And “if your goal is both energy efficiency and sustainability, the switch to a heat pump over a traditional gas furnace is a smart move.” He also suggests: “By making the switch to a heat pump system, you’re not only reducing your carbon footprint, but also ensuring a cozy home for all seasons.”

I was particularly disturbed to hear one of the apologists for the builders’ promotion of the Line Extension Allowance arguing that electrification served no benefit because a substantial percentage of Oregon’s electricity is generated from coal or gas. While this is accurate currently, the statement represents further dissembling since HB2021 passed in 2021 requires that retail electricity must be generated 100% by clean sources by 2040.

It appears to me that too many builders and association representatives are so focused on maximizing their own profits that they ignore the health of home inhabitants, the climate crisis, and evidence that would lead to a more socially responsible position. When it comes to considering affordable homes, the comments of a builder who proudly noted his cheapest home cost \$2 million should probably be completely discounted.

In reviewing the comments of those testifying, please take time to evaluate the claims and assess whether the testimony is germane and accurate or merely self-serving.

Respectfully submitted



Alan Journet

Sources Cited

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Shuff C 2024 NW Natural Asks for an 18% Rate Increase for Oregon Households. Citizens Utility Board (CUB) <https://oregoncub.org/news/blog/nw-natural-asks-for-an-18-rate-increase-for-oregon-households/2970/>



NW Energy Coalition
for a clean and affordable energy future

April 22, 2024

Via Electronic Filing
puc.filingcenter@puc.oregon.gov

Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, OR 97301-3398

RE: Docket UG 490 NW Natural Gas Request for a General Rate Revision
Comments from Northwest Energy Coalition (NVEC)

Dear Chair Decker, Commissioner Tawney, Commissioner Perkins and Staff of the
OPUC,

Thank you for the opportunity to provide the below comments on NW Natural's rate increase proposal. Overall, NVEC is concerned about the amount of utility rate increase proposals happening simultaneously and the compounding costs that customers, especially both gas and electric customers, will bear if passed. Moreover, 90% of NW Natural's accounts are composed of residential customers¹, most of whom live in rural counties of Oregon that have been flagged in the 2018 Biennial Energy Report² as energy burdened, with 15% to up to 50% of households in those counties paying 6% or more of their income on energy while earning 200 percent or below federal poverty level. Connecting the dots here means the impacts of a NW Natural rate increase will affect energy burdened households and their livelihoods the most, making this an energy justice issue.

NVEC points to the biennial report because we could not find data on NW Natural's total customer energy burden. NW Natural's Low-Income Needs Assessment (LINA) Energy Burden Analysis conducted by Applied Energy Group, Inc only reflects "typical energy

¹ UG 490 – NW Natural's Executive Summary, p. 2

² Oregon Department of Energy 2018 Biennial Energy Report, Ch.7, p. 4 available at:
<https://www.oregon.gov/energy/Data-and-Reports/Documents/BER-Chapter-7-Protecting-Consumers.pdf>

burden across NW Natural's service area and how (it) varies by geography."³ The figures provided only show urban cities in NW Natural's service territory as selected areas of energy burden. NWECA would like to see greater efforts on NW Natural's part in the next LINA or Energy Burden Assessment to paint a more accurate picture of their customers' energy burden, especially in rural counties. An updated assessment should inform what reasonable rates look like, and is intrinsically tied to the approach and success of low-income discount programs from UM 2211.

We would like to see strong efforts from PUC Staff and Commissioners to regulate rate increases for customers to better adapt to increasing costs as well as stricter rules and tracking for how utilities are using customer dollars. Political activities such as lobbying or pro-gas educational campaigns should not be paid for by customers. PUC Staff and the Commission should also explore solutions such as introducing rate increase caps, which follow a similar concept from Oregon's rent increase caps. We support CUB's proposal to limit rate increases to 7% plus inflation or 10%, whichever is lowest, and any requests over that cap would be pushed into the next year or beyond. Furthermore, we support CUB's recommendation for the Commission to implement a rate shock mitigation mechanism to be used as needed, such as during winter high usage times.

During the 4/16/2024 UG 490 public comment hearing, multiple developers claimed that line extension allowances are not subsidized by customers. The facts are that NW Natural is currently asking to increase the number of customer dollars to up to \$3,600 per new gas hookup. This is a subsidy that is a 25% increase from what the PUC struck down less than two years ago. We hope the PUC stays on the same track as before and does not approve these line extension allowances. NWECA does not agree that NW Natural customers should pay subsidies to continue to expand the gas system, instead we strongly advocate for gas utilities to incorporate decarbonization pathways into all planning and to identify the lowest reasonable cost path to decarbonize the overall gas energy system.

We encourage the Commission and Staff to research and implement mechanisms to address energy burden and energy access for the long-haul and put the public's livelihoods first. We appreciate the current work that has been seeded to address equity concerns of utility rate proposals through EJ Workshops and look forward to continuing engaging in those.

Sincerely,

³ UG 490 – NW Natural Low Income Needs Assessment Exhibit 201, p. 18-21

/s/ Alessandra de la Torre

Policy Associate

Northwest Energy Coalition

Public Comments Received on the Commission's Website After April 6, 2024

Katherine Brann-Fredricks	<p>NW Natural wants to raise residential rates by 18%. Utilities like NW Natural are using our money to lobby in favor of fossil fuels. Here's a Guardian article about the American Gas Association, which has "annual budgets between \$30m and \$60m and has long worked to thwart climate efforts." David H. Anderson President & CEO of NW Natural in Portland OR was Chair of the American Gas Association (AGA) Board of Directors in 2021. He is still a member of the AGA Board. It's offensive for utility customers to pay higher rates so NW Natural can launder money through the AGA, to hire more lobbyists for more greenwashing. Please deny this rate hike. Please also get politics out of our utility bills: 1. Tighten up rules to keep utilities from using ratepayer dollars for political activities. 1. Require regular disclosures from utilities about their political spending. 1. Establish clear enforcement mechanisms, including fines sufficient to deter violations.</p>
Molly McDevitt	<p>Residential gas users can't absorb an 18.8% rate increase in their gas utilities. The proposed increase places the largest burden on residential and small commercial customers, those least likely able to absorb the costs and most likely to be consuming less than large commercial and large industrial customers. NW Natural had a \$93 million profit in 2023. This is a utility that none of us has an option of not using, it is built into our homes and apartments. We are being held hostage by a desire for a higher profit margin for shareholders. This rate increase will force people to choose between basic needs like food, or being able to heat their homes. The rate increase is simply too high for the average consumer to bear. We have an exploding working poor who can no longer afford a roof over their heads because our income can't keep up with the costs of living.</p>
Sue Craig	<p>To Chair Decker, and Commissioners Tawney and Perkins, thank you for this opportunity to comment, and for taking your valuable time to consider the public in your comments. I am soon to be 87 years old. It is so strange to me, that Gas companiesat all levels do not see the consequences of their business models, except where their investors are concerned. Surely, they see what I see. If we do not do everything in our power, NOW to curb our CO2 output, we truly will not survive on this earth. NW Natural is a good example of this "blindness". They seem to have no way of thinking of going into the business of electrification, and now want to pass on to their customers a rate increase that will in</p>

	<p>no way help our dear earth. Please insist that they follow your plans to help which you have given them as a lead. Instead of looking into how to get into an electrification model for their future, they are, among other things, buying up water futures! I am in 7 different Environmental groups. There are so many ways that this company could help. I really get frustrated with such poor vision, when it is SO obvious what needs to be done. Sorry....thanks for letting me rant!</p>
Linda Perrine	<p>Chair Decker and Commissioners Tawney and Perkins, thank you for the opportunity to testify today. My name is Linda Perrine and I am a resident of Lincoln City, OR. I am a NW Natural customer. I am very concerned about methane's serious contribution to Climate Change. Another concern is the explosive nature of natural gas in light of the massive earthquake that the region is due to experience. The State of Oregon and communities in Oregon are working to address Climate Change through electrification of homes, public buildings and businesses. Electrification would address both concerns above which is why I advocate for electrification in Lincoln County. Commissioners, please REJECT NW Natural's deeply flawed proposal that will prop up its polluting gas system in the face of emission reduction obligations by expanding its system and relying on expensive false solutions like biomethane and hydrogen blending. Please REJECT NW Natural's proposal to increase its ratepayer-funded subsidies for many new gas connections, and instead order it to END these outdated, expensive, and climate-damaging subsidies. Please build on the clear direction that you gave in NW Natural's integrated resource plan to appropriately consider and incorporate electrification into the utility's decarbonization strategy. It is clear that the only feasible and cost efficient pathway for gas utilities like NW Natural to comply with the State's climate goals and decarbonize the gas system is through investments in electrification. Instead of allowing the utility to continue to prop up its business model with expensive and ineffective investments in out of state factory farms and other sources of RNG, listen to the countless ratepayers and local governments calling for a managed transition to all electric homes and buildings. Additionally: * NW Natural falsely claims that it can meet its decarbonization obligations while adding more customers by relying on false solutions like biogas and hydrogen blending. These unproven resources are expensive, scarce, and dangerous, and relying on them puts huge financial risks on NW Natural's customers if they fail to materialize. * NW Natural has asked to increase its return on equity which means more money going from customers'</p>

	<p>pockets to investors in part because it recognizes its business model is out of sync with state climate policy and is, therefore, risky. But NW Natural has not proposed any steps to manage that risk by aligning its business with state policy. If NW Natural is going to charge more based on this risk, it must be required to invest in electrification, which is its only viable long-term decarbonization strategy. * Please build on your guidance from NW Natural's integrated resource plan by directing the utility to pursue electrification, which is the only feasible, proven path to meeting its decarbonization obligations under state policy. As an Oregonian and a NW Natural customer, I want my utility to pursue an electrification-based decarbonization strategy that aligns with expert analysis and relies on proven technology, not the risky strategy based on false solutions that NW Natural has proposed. * NW Natural's higher fixed charge on new single-family and multi-family occupants will burden new homeowners with a charge they can do nothing about. The company proposes to encourage developers to install gas appliances through its line extension subsidy while penalizing new homeowners with a high fixed charge based on the developer's subsidized decision to install gas appliances that homeowners did not ask for. Meanwhile, existing ratepayers are burdened with the costs of the expanded gas system for decades to come. We are in a Climate Emergency! There is no more time to waste on a gas system that pollutes with methane. We need the PUC to require NWN to move to electrification retrofits and products immediately (heat pumps installations). This is an ALL HANDS-ON DECK moment and NWN needs to move to solutions that do not harm the planet and people.</p>
<p>Ronda Rozzell</p>	<p>Please do not entertain an 18% increase for NW Natural's rate increase. I understand some increases are necessary, but due to the inflation we are swimming in 18% is too much to bear, possible 5% or under would be the best for all Oregonians facing the high cost of living. Thank you for your time and consideration.</p>
<p>Roseann Johnson</p>	<p>Dear Judge Spruce and Oregon PUC Commissioners, Lennar Northwest, LLC provides this letter in support of NW Natural's proposed Line Extension Allowance. The LEA is one aspect of NW Natural's overall Request for a General Rate Revision. Lennar develops and builds residential communities throughout Oregon. Since its inception, Lennar has sought to provide quality and attainability for its customers. Based on close interaction with thousands of prospective and actual Oregonian homebuyers each year, Lennar understands the</p>

	<p>amenities households desire and need. As a result of its market pulse, Lennar has generally offered both electric and gas energy systems within its homes. Providing a hybrid energy setup grants our customers choice while protecting household resiliency, and allows customers to include the amenities they value, such as gas fireplaces and tankless hot water heaters. We support flexible energy policy that will allow infrastructure to adapt over time, continuing to lower carbon emissions. Historically, Lennar has been able to offer hybrid energy scenarios as a direct result of NW Natural's LEA. Over the past couple years, however, a steady LEA reduction has jeopardized the likelihood of energy hybridization within our communities; the results would be increased cost and less choice for the consumer. The good news is that NW Natural's proposed LEA provides a win-win, supporting decarbonization and bolstering hybrid systems offered by the developer/builder at the same time. While the current LEA structure offers higher allowances for more gas appliance use, the proposed LEA is directly associated with targeted gas appliance install, and efficient lower gas use. For example, a builder could offer a household electric heat with gas heat backup, which would only kick on in times of need, using energy in the most cost-effective manner. The proposed LEA opens doors to investment in future hybrid options that reduce emissions and comply with low-carbon objectives. The proposed LEA increase works in tandem with the private developer/builder infrastructure contribution, raising the likelihood that resilient hybrid energy systems will continue to be built throughout Oregon communities. If the pandemic taught us anything, it's that infrastructure is expensive, and it makes sense to leverage existing assets in order to hedge against extreme inflationary pressures. Consequently, a network of supplemental energy backbones in the ground means choice, backup energy, and more affordable energy resiliency for Oregonians. Lennar supports the proposed LEA element of the NW Natural Request. By approving the LEA, the State is prepared to realize years of resilient energy planning for future Oregonian households. Sincerely, Roseann Johnson Entitlements Manager Lennar Northwest, LLC</p>
<p>Deanna Palm</p>	<p>Chair Decker, Commissioner Tawney, and Commissioner Perkins: The Washington County Chamber of Commerce strongly supports NW Natural's line extension proposal, which we believe is essential for fostering economic development and enhancing community well-being in our region, while focusing on decarbonizing the energy system and protecting resiliency for residents. Washington County is a vibrant</p>

	<p>community with growing residential and business needs. NW Natural's innovative proposal to enable the building community to affordably deliver housing with resilient energy systems will significantly benefit our local businesses by providing residents with reliable, cost-effective energy options that are crucial for daily operations and long-term planning. This proposal is not merely an enhancement of resiliency; it is an investment in the economic foundation of our county. Moreover, this project aligns with our commitment to sustainability and responsible resource management. Natural gas plays a pivotal role in our transitional energy strategies, helping us balance economic growth with environmental stewardship, while ensuring that the energy that residents depend on is available, even during extreme weather events. By supporting this proposal, we are endorsing a vision that promotes growth, reliability, and sustainability a vision that is integral to the future of Washington County. Therefore, I urge the Commission to consider the substantial positive impacts this project will have on our community and to approve NW Natural's line extension proposal. Thank you for your attention and consideration. Deanna Palm President/CEO</p>
Jeffrey Fish	<p>I am not if favor of the Oregon Public Utility Commission reducing the line extension allowance for natural gas. As a builder of single and multifamily entry level residences over the past 50+ years, I still find the buying public looks for natural gas heating and cooking appliances. My buyers know there is a lot of discussion about going all electric with heating and cooking appliances, but like me, most of them have yet heard anyone explain how we are going to get too zero emission goals without using some form of fossil fuels in the future. There is not enough wind and solar power to convert to strictly electric energy heating and cooking platforms. Once we solve the problem of providing enough electric energy for electric automobiles and houses then I will be in favor of maybe reducing the extension line credit. We need to continue to offer more flexible and adaptive energy policies that gives the home buying public more choices for their home energy needs. Allowing the existing extension line credit to remain in effect, will help in providing affordable housing to the public in Oregon. Fish Construction NW, Inc.</p>
Max Bondar	<p>Dear Commissioners, I am writing on behalf of David Weekley Homes to emphasize the critical nature of the proposed adjustments to the Line Extension Allowance in the NW Natural Rate Case. Our recent interactions with Portland General Electric and Columbia River PUD have highlighted electrical system limitations and capacity issues that</p>

	<p>necessitate costly electrical infrastructure upgrades. These challenges potentially limit development on otherwise developable land. The financial burdens associated with these upgrades will inevitably be passed on to future homeowners, substantially raising construction costs and increasing both initial home prices and ongoing utility expenses. Additionally, the issue of home affordability is further exacerbated as less expensive gas appliances are being replaced by more costly electrical appliances. Therefore, we strongly advocate for maintaining or increasing the NW Natural Line Extension Allowance and demand complete transparency from electrical companies and NW Natural regarding their installation, energization, and extension costs for new subdivisions. Last year, our payments to Portland General Electric included significant and unclear "Overhead" charges on top of material and labor costs. To our knowledge, there is currently no accountability for PGE's or NW Natural's "Installation/Extension" costs charged to developers. We are observing massive increases in utility installation costs coupled with decreases in extension allowances, which underscores a profound need for regulatory oversight and transparency in this area. We appreciate your attention to these pressing issues and are committed to processes that support the well-being of our community and the sustainability of our industry.</p>
<p>Paul Vogel</p>	<p>OPUC Consideration of LEA General Rate Case Filing (UG490) to Support Decarbonization Dear Mr. Lockwood and Oregon Public Utility Commissioners; On behalf of the Board of Directors and membership of Columbia Economic Team, as well as the residents of Columbia County, we urge Oregon Public Utility Commission approval of NW Natural's Line Extension Allowance proposal to incentivize decarbonization, offer economic and energy choices to all household income levels, and support both housing and economic development in rural Oregon. The Columbia Economic Team (CET) is a countywide membership organization with the mission to promote the creation, retention, growth, and attraction of business and industry throughout our rural county. Operationally, CET is comprised of five core functions: economic development, small business development, localized small business marketing and promotion, entrepreneurial ecosystem development, and tourism. NW Natural's proposal tangibly and positively impacts every aspect of our service to the people of this county. A relatively small-population, rural-to-semi-rural county must rely upon multiple energy options in order to foster growth of diversified industry</p>

	<p>and its workforce population. Indeed, virtually all of Oregon is currently constrained by electricity transmission shortfall. Nowhere is that truer than in Columbia County. Potential grid solutions are long-term, which will adversely impact job, housing, and overall economic growth here, having received stark reminders of that just in the past thirty days. Our organization has taken on Oregon's, and the Governor's, housing challenge. This line extension proposal will lend both stability and impetus for housing here with an eye to affordability, enabling business to count on workforce livability and the people supply chain. At such a critical time of high housing and energy uncertainty, proactive proposals that align with improving focus on both areas, while being mindful of the state climate goals are essential, and welcome. Columbia County is not the only rural region impacted by energy and housing constraints. The fact is, much of rural Oregon is similarly impacted on both fronts, and NW Natural serves many of our counterpart communities. The company's foresight and non-conventional thinking will introduce stability to Line Extension Allowance requirements and projections, thereby introducing more stability into housing construction costs, and resilience in diversified energy supply and use. Further, providing greater stability, predictability, and incentivizing decarbonization encourages continuous progress toward renewable and cleaner fuel use " and progress toward our state, national, and global carbon goals. Global aspirations are important, but these things start at home, with homes. Columbia Economic Team supports this common-sense proposal by NW Natural to do yet one more thing it can and urges the Oregon Public Utility Commission approval to create the nation's first residential Line Extension Allowance (LEA) program that supports affordable housing objectives, energy supply resiliency, and energy grid decarbonization. Thank you in advance for your consideration and foresight in approving Filing UG490. Sincerely, Paul Vogel Executive Director</p>
<p>Jan Hames</p>	<p>As a lifelong Oregonian and a Senior who recently retired after working nearly 50 years I vehemently oppose ALL requests for ALL utility increases. It is getting to the point you are knowingly pricing Seniors/Veterans right out of their homes. Every day we find more and more of our Seniors/Veterans pushed out onto the streets of Portland - it's a total disgrace! You tell people to turn their thermostats down only to increase rates to cover the reduction in service! We already have Seniors/Veterans who sit in their homes without heat in freezing temps in the winter and die from heat related</p>

	<p>episodes in the summer! 18% increase for those who barely use gas but let's give those a break who are eating it up! No incentives, no accountability and poor planning - do better!</p>
Jeremy Osterholm	<p>April 16, 2024 Good Evening, My name is Jeremy Osterholm. I am the 2024 Board President for the Home Building Association of Greater Portland. I am also the owner and President of Ostercraft Homes Inc. Where I am a second-generation homebuilder in the metro area. I come before you today in support of the NW Natural Gas Line Extension Agreement proposal. The Home Building Association of Greater Portland also known as the HBA is dedicated to maximizing housing choice for all who reside in our region. Our members are industry professionals across the Portland Metro Region in 6 counties, 40 cities, and many more service and utility districts. Our members have been heavily involved and working with Governor Kotek, this last year, on housing growth and housing affordability initiatives that she has successfully proposed. The recent trend of reducing the Line Extension Agreement (LEA) with the end goal of eliminating it plays against affordable housing. For years the LEA has provided our members and communities around the region with a viable option to have multiple energy sources in homes. Without the LEA builders will continue to provide Natural gas to homes but the consumer will ultimately pay more for this product increasing the cost of housing. However, the current proposal presented by NW Natural provides an incentive to not only provide natural gas as an option it incentivizes builders to use more energy efficient equipment in the homes they build. This is a win for housing affordability and for the environment. As a second-generation home builder, my family has been building homes in the Oregon since 1974. I can proudly say in our 50 years of building we have been installing natural gas to our homes. It has been an amenity and an asset for our home buyers. As a small company we work daily to try and find a way to lower the cost of our homes so that we can compete in today's market. We are also always trying to anticipate what the next generation of consumer is going to want in their homes. In light of massive power outages, the last few winters our consumers are making sure that we are able to provide Natural gas as well as power so that they can have options when they are out of power during these winter storm events. They are also asking for energy efficient products. The new LEA proposal from NW Natural will make it easier for me to provide my customers with energy efficient products and help keep my costs in check. I have read through NW Natural's proposal and I am not only in support of it, I am thankful that</p>

	<p>they have answered the call to serving our industries growth, while lowering emissions. I'd ask that you please take my testimony into account and approve this proposal. Thank you for time, Jeremy Osterholm Home Builders Association of Greater Portland, Board President Osterholm</p>
Ron Davis	<p>NWN Gas request is unreasonable. The median salary is reported to be nearly 123,000; CEO compensation reported to be more than 3.6million, profits were up 10% and dividends paid last year were more than 76% of the reported net earnings. There is plenty of room in there to retain earnings rather than stick it to the consumer. The median Portland HOUSEHOLD income is reported to be 84,000. NWN seems to pay 46% more to individual employees than the average working couple earn -- another source of capital for NWN. No increase is warranted. An 18% increase in rates on top of the actual 30% per therm increase granted in November is unconscionable, unreasonable, unnecessary and contrary to the mandate given the PUC.</p>
Larry Weymouth	<p>Commissioners: I urge you to reject NW Natural's proposal to increase its ratepayer-funded subsidies for many new gas connections, and instead order it to end these outdated, expensive, and climate-damaging subsidies. Please build on the clear direction that you gave in NW Natural's integrated resource plan to appropriately consider and incorporate electrification into the utility's decarbonization strategy. Sincerely, Larry Weymouth Corvallis, OR</p>
James Holms	<p>Dear Chair Decker and Commissioners Tawney and Perkins, I live in Corvallis, and I am greatly alarmed by our climate crisis. The approaching summer recalls in my mind relentless heat and days of air pollution from forest fires. The science is clear: fossil fuel carbon emissions are warming our planet. Each additional ton of emissions equals more warming driving even more climate chaos. I urge you to consider future generations when making your decision about NW Natural's rate requests. I feel strongly that now is the time to stop emitting carbon pollution to protect our natural environment and to protect children from indoor pollution. Please reject the NW Natural's rate request. Future generations will appreciate this action. Sincerely, James E. Holm 3229 SE Shoreline Dr. Corvallis, OR 97333</p>
Thor Hinckley	<p>Dear Commissioners, On behalf of the Coordinating Committee for Third Act Oregon, an Oregon non-profit of over 300 seniors working to support Democracy and fight climate change, we ask that you reject NW Natural's deeply flawed rate hike request. This misguided proposal will only serve to</p>

	<p>increase fossil fuel use, and the resulting greenhouse gas emissions that pose an imminent threat to our climate. By rejecting NW Natural's proposal to increase its ratepayer-funded subsidies for new gas connections, and ordering it to end these outdated, expensive, climate-damaging subsidies you will be helping to protect Oregon's environment for current and future generations. This rejection will build on the clear direction you provided in response to NW Natural's Integrated Resource Plan, to appropriately consider and incorporate electrification into the utility's decarbonization strategy. In light of the danger posed by fossil fuel emissions, the only feasible and cost-effective pathway for gas utilities like NW Natural to comply with the State's climate goals is to quickly decarbonize the fossil gas system by increased investments in electrification. Instead of allowing the utility to continue to prop up its business model with expensive and ineffective investments in out-of-state factory farms and other sources of RNG, we ask that you listen to ratepayers and local governments calling for a managed transition to all-electric homes and buildings. Thank you. Thor Hinckley Coordination Committee Member Third Act Oregon</p>
Karen Jacobson	<p>Dear Commissioners, I am a NW Natural customer who lives in SW Portland. I'm also a medical professional and a mother to two elementary school aged girls. I'm deeply concerned about NW Natural's proposal to increase rates for customers to fund their expansion of the gas system. We know that in order to meet state climate goals we need to shrink the use of fossil fuels and increase the use of electrifying our households and businesses. It makes no sense to fund the expansion of dirty methane gas pipeline systems. NW Natural proposes to encourage developers to install gas appliances through its line extension subsidy. The company is also proposing a new higher fixed charge on new homers. This proposal would doubly burden families with higher charges and dirty air from methane gas appliances for years to come. Please be skeptical of false solutions like biogas and hydrogen blending that NW Natural is claiming will meet its climate obligations. These are unproven technologies that are expensive and dangerous. Electrification is a proven, inexpensive way to meet our climate goals and NW Natural should be required to comply with the state's climate goals to increase electrification. I am asking commission to reject NW Natural's proposal and order NW Natural to eliminate its line extension allowance. Thank you so much for the work you do and for reading my comments. Thank you for holding companies accountable and</p>

	working to make our state healthy and green for years to come.
Alice Shapiro	<p>Greetings Chair Decker and Commissioners Tawney and Perkins, I am a NW Natural rate payer, and I am concerned with the increasing climate disasters we are facing here and in much of our fragile planet. I have grandchildren here in Portland and I am concerned that their lives will become much more challenged if we don't do all that we can to mitigate the damage we have already done to global climate. In order to meet climate targets and avoid wasting money on unneeded gas infrastructure, we need to stop expanding the gas system and start shrinking it immediately. This means ending line extension subsidies for new gas connections, not increasing those subsidies as NW Natural has proposed. Commissioners, please reject NW Natural's proposal to increase its ratepayer-funded subsidies for many new gas connections, and instead order it to end these outdated, expensive, and climate-damaging subsidies. Please build on the clear direction that you gave in NW Natural's integrated resource plan to appropriately consider and incorporate electrification into the utility's decarbonization strategy. We must do all that we can to reduce CO2 and methane in our atmosphere. NW Natural must be regulated to become part of a truly clean energy future and must not be allowed to continue with false, expensive "solutions." Sincerely, Alice Shapiro 2545 SW Terwilliger Blvd Apt 1105 Portland, OR 97201</p>
Robert Rutkowski	<p>Dear Chair: Oregon regulators will hold a public comment hearing Tuesday, April 16, on NW Natural's proposal to raise utility bills for gas customers by 18% starting next year. Residential NW Natural customers already pay on average 50% more than they did in 2020. NW Natural's proposal seeks to expand subsidies to grow the gas system instead of investing more wisely in clean energy infrastructure. NW Natural is also looking to increase the company's profitability through a higher return on investment at the expense of customers. Regulators should reject the utility's requested spending. Several organizations, represented by the Green Energy Institute at Lewis & Clark Law School and Earthjustice, are intervening in the rate case to keep rates affordable and equitable, while ensuring realistic decarbonization policies for NW Natural. In an Oregon Public Utility Commission (OPUC) ruling from the 2022 rate case, state regulators ordered NW Natural to reduce gas subsidy spending that encourages new homes to be built with gas. NW Natural's current proposal ignores that order and instead asks to increase subsidies for</p>

	<p>new gas hookups by 25% up to \$3,600 per hookup. These subsidies would cost customers tens of millions annually and install unnecessary additional gas infrastructure that will be costly to maintain. The hearing comes as NW Natural has been under increasing scrutiny for their stringent opposition to climate action and for using ratepayer funds to support aggressive anti-climate lobbying and advertising across the state. Yours sincerely. Robert E. Rutkowski 2527 Faxon Court Topeka, Kansas 66605-2086 M:17855809271 E-mail: r_e_rutkowski@att.net<mailto:r_e_rutkowski@att.net></p>
1953drahcir61@gmail.com	<p>According to the MET Group, while carbon dioxide emission is lower than coal and oil, burning natural gas also releases methane, which is a strong greenhouse gas that leaks to the atmosphere in a big amount. Burning natural gas also emits carbon monoxide, nitrogen oxides (NOx), and sulfur dioxide (SO2). (MET Group is an integrated European energy company, with activities in natural gas and power, focused on multi-commodity wholesale, trading and sales, as well as energy infrastructure and industrial assets.) Methane is a much more potent greenhouse gas than carbon dioxide as well, and "natural" gas is mostly made up of Methane. So, my comment then, is why grant a rate increase to a company that continues to pollute the environment? Terms like "Less than others" or "Cleaner than most" are oxymorons, because it is not clean at all and "Less than others" is no excuse, because natural gas still releases pollutants into our environment. So, why should taxpayers be made to pay more for a Natural Gas that not only is a cost burden to low income and other disproportionately disenfranchised communities, but continues to pollute the environment we are trying to clean up?</p>
Eric Strid	<p>Chair Decker and Commissioners Tawney and Perkins, thank you for this opportunity to testify about NW Natural's rate case. My name is Eric Strid and I've been a customer of NW Natural for over 25 years. During that time, I completely electrified one of our houses, another kept methane only for a backup heating stove, and the other is awaiting the right induction cooktop before it will be free from methane pollution. My perspective is an outlier, in that I actually care about the train wreck we are leaving to our children and grandchildren. I am an engineer by training, cofounded a high-tech company in Beaverton, and took it public in 2004. I retired in 2012 but immediately went back to work on decarbonization when I realized that our climate change predicament was so desperate. And of course it has gotten far worse since then. From an economic perspective, our climate dilemma is much deeper than most</p>

	<p>people can fathom. Conservative estimates of the global cost of carbon emissions triangulated \$200 to \$800 per MTCO_{2e} six years ago; meanwhile the traditionally libertarian Chicago school of economics recently estimated that \$190 per MTCO_{2e} emitted by global public companies equates to about 44% of their total operating income. In other words, if investors valued assets over a 50-year horizon instead of 50 weeks, your 401K would be totally worthless. The big picture for methane providers is that there is no future, so they continue to deploy Big Tobacco tactics to delay their inevitable demise. But OPUC is in the driver seat, and I commend your efforts to decarbonize NW Natural! OPUC should refuse any rate changes until NW Natural proposes an acceptable plan for an orderly shutdown of their emitting supplies which is at least 90% of their current grid. If they still want to supply RNG, let them propose a plan for zero emissions with practical costs. Of course there are no solutions in that space, so in any case OPUC should require NW Natural to periodically (annually) disclose methane volumes delivered by branch of their grid, with enough spatial resolution that jurisdictions and communities can plan for pruning the branches as efficiently as possible. Pruning will require major long-term planning, and NW Natural will resist and sabotage any such efforts as vigorously as they can. Thank you for this opportunity to speak out.</p>
Dan Doede	<p>I would like to express my strong objection to NW Natural's proposed residential rate increase. My wife and I are on social security and live on a fixed income. The proposed rate increase is over 5 times the amount social security allowed for a cost-of-living adjustment this year and would cause us a significant hardship in our monthly budget. I know that the cost of everything is going up, but this amount of an increase is obscene.</p>
NA	<p>I just heard on the news that NW Natural Gas wants to raise their rates 18%, it seems kind of sneaky to me the way their doing it, on my latest billing from them they mention on the bottom of the bill: "NW Natural is sharing over \$29 million in bill credits as a result of efficient pipeline and gas storage management from the past year. You'll see the credits on your February and April bills." And then I hear on the news otherwise. I can see an increase but 18%! I remembered a time when Public Utility Companies were more rational about their rate increases and the PUC would do a better job of managing rational increases especially back in the 70's when they seemed more an advocate for the people. I know Oregon</p>

	wants to get rid of all Fossil fuels as soon as possible but until that time people need gas to heat their homes and cook their food. Oregon is becoming a very expensive place to live and to people living within limited economic means, another 18% increase on their Utility Bills on top of everything else isn't going to help matters much. Thank you.
Rhonda Meier	Things are so high and hard right now. My grandson has NW gas and his is turned off. He's trying to get ahead so he can turn it back on. Please don't increase it by 18%. Everyone is trying to get by. Thank you for hearing me.
Sarah Wilkinson	In a time of record profits (93 million) please consider not having such a huge increase (18% increase for residential). Families are struggling to make ends meet as it is. My husband and I both work full time and pinch pennies each month to put food on the table. Prices of essential items continue to rise when pay is not rising at the same rate. As a mother I worry every month how to keep food on the table and a roof over our heads, this should not be a worry when I work full time.
Kim Bogus	Shame on you. Almost \$100 million profit and you want more? So many people won't be able to afford this so they will turn down their heat and someone will die from the cold. And you will end up selling less gas. My thermostat is going down 18%. I'll wear two sweaters.
Kourtney Kuiper	To whom it may concern, I wish to give my public comment opposing the rate increase proposed by NW Natural Gas as stated in UG 490. The heaviest hit group by the proposed rate increase are the everyday residents. We everyday residents are the same who are hardest hit by the PGE rate increase, our local garbage utility increases, our city water and sewer increases, our grocery bill increases, our rent increases, and every other financial impact on our day to day lives. NW Natural reported a \$93 MILLION profit in 2023. How can utility company have such an enormous profit while still feeling like a substantial rate increase of 18.8% is justified? Yes, it may "only" be an average increase of \$14/household but that stacked on top of the already innumerable financial increases that we everyday people are encountering feels astronomical. A company reporting that much profit should not be given the green light on a rate increase, and the compounding effects on everyday residents from all utilities/service providers/state of inflation should be considered before allowing another rate increase from a CLEARLY very profitable company.

Faith Burlingame	In a time when everyone is struggling to stay housed and put food on the table due to extensive corporate greed, it feels irresponsible to raise more rates. If we already have a homeless problem, maybe we shouldn't add to it by causing more stress financially. It's clear that they are making plenty of profits so maybe they should start making cuts within the company instead.
Cara May	This is excessive, especially considering nw natural profited 93 million last year. This rate hike will hurt already struggling families, individuals, and seniors.
R. Buchanan	If NW Natural has made a \$93 million profit last year, I don't believe that need to raise rates on their customers. It seems that corporations everywhere are raising prices during this time of inflation. The consumers are struggling with the high prices and the corporations are making huge profits off of it! Give us a break.
Michael Schilling	Fowler Real Estate Group is in support of NWNG proposal on having a reverse Line Extension Allowance (LEA). To be clear on what being proposed is to offer a higher allowance for decreasing the possible therm usage of Natural Gas. The idea is unique approach and one we believe is in the correct direction for the future of affordability and resiliency of future housing while taking into consideration sustainability and emissions. One of Governor Kotek's top priorities is for housing growth and housing affordability. Fowler Real Estate Group purchase raw property, take it through entitlement, develop the property and then build homes. We develop approx 150-200 lots per year. Selling half the lots and producing 60-90 homes per year. The majority of our production are smaller homes, townhouses and apartments. Currently the LEA have covered the cost of getting the line to the home. Any reduction of the LEA will cause the lot cost to rise and be passed on in higher housing costs. Our clients continue to seek the ability to have gas for an energy option. Two thoughts: 1) Low density housing (larger more expensive homes) will continue to desire gas as a choice and will be able to pay for the additional cost even if LEA are reduced. 2) Medium/High density housing, which is where most of the middle housing/more affordable homes and multifamily are constructed. If LEAs are reduced, then we risk the resiliency of this type of housing or we decrease the affordability of this housing type (Governor's priority). To be clear as a builder/developer we are very concerned about both. Several years ago Texas had an ice storm that caused a long power outage. Homes there are typically heated/cooled with heat

	<p>pumps and mini split systems that rely on the electrical grid. Lives were lost due to the cold. Texas is much further south. Oregon, even in the Willamette Valley, experience colder temps and power outages. So as we are switching our middle housing and multifamily to heat pumps and mini split systems the ability to offer gas as a backup (Resiliency) becomes necessary to avoid power or heat loss. So, we are faced with a choice if LEAs are decreased for our middle and multifamily housing: A) Provide a home that has less resilience than currently offered at an "affordable" price. (Risky proposition) or B) Provide a home that is more expensive but possess resilience. (Fewer individuals will be able to afford.) Again, Fowler Real Estate Group supports the continuation of LEAs as proposed by NWNG to allow for continued building of resilient and affordable housing. By providing a reverse therm LEA as proposed we can accomplish goals of the PUC and continue to provide affordable housing.</p>
Vanessa Fulton	<p>I oppose the proposal for NW Natural raising rates. In 2023 they raised rates, added 15,000+ accounts, and cut pension expenses. They are still making a hefty profit, and this is just a cash grab. Residential customers shouldn't have to foot the majority of the bill, again.</p>
Christy Sarsland	<p>I hope I clicked the right one. I am opposing the rate adjustment proposed for Northwest natural gas. It is not our responsibility to pay for Northwest natural infrastructure upgrades. This is something they should have padded into their bottom line instead of paying their shareholders that they want to now, increase the cost to all of the people in the area seems like it is only because PGE and Pacific power are also doing it, and they are jumping on the bandwagon. While they say a percentage increase is only \$15-\$20. In reality, it is usually much more than that their estimates are never what they are an actual fact.</p>
Bill Mason	<p>I am writing in protest of NWNG's request for an 18.8% Residential increase. UG 490 as it is requested is not reasonable. The below statement by NWNG needs to be questioned. Are the costs necessary? Do they need all of the money now? Do they really need all of the items they list? Why is NWNG not absorbing many of these items as cost? The stockholders of NWNG should share in this burden as they reap the profits. 'NW Natural claims these proposed rate increases are "necessary to account for the construction of seismically resilient regional resources, addressing capacity constraints on the system, actions to comply with federal pipeline and safety requirements, a meter modernization</p>

	<p>program, modernization of information and technology service systems, and inflation." Sure, new meters would be nice, but are they necessary. Meter readers work fine, have the customer report usage and check it a couple of times a year if they want to reduce cost. Modernization of information and technology service systems, why? This becomes a joke after a while, old systems work for a long time and a new system won't make the gas any better. My wife and I are retired and live basically on a fixed income. What little we receive has been eaten up by other utility increase, the cost of gasoline, groceries which are a major part of our expenses and the general cost of living. We cannot afford a 19% increase in our gas bill. NWNG needs to learn to deal with what they have, not what they want. Respectfully, Bill Mason Clackamas County.</p>
Chuck Arefore	<p>Chair Decker and Commissioners Tawney and Perkins, thank you for reading this email testimony. My name is Chuck Areford and I have lived in Eugene for thirty-five years. Ever since my neighbor had natural gas installed several years ago, I routinely smell natural gas on my front and back porch. I contacted Northwest Natural who promptly investigated. They pointed out that the exhaust outlet for my neighbor's natural gas was pointed at my house and the gas I smelled was the normal unburned gas whenever the air and water heating systems start-up and shut-down. This considerable amount of methane pollution would be classified as post-consumer use and rarely calculated as a greenhouse gas emission under any system. Please deny the request of Northwest Natural to increase their rates. Here in Eugene, NWN has talked about and pledged to reduce emissions since 2018. During this time, if they met their local growth targets, they would have increased their distribution by three percent a year, and over the last five years, that is fifteen percent. During this time, they may have reduced their emissions by a tenth of a percent with renewable natural gas. In other words, their emissions continue to steadily increase while they publicly talk about emission reduction. According to Robert Howarth of Cornell University, the leading expert on methane leakage/emissions from natural gas, natural gas is far worse than coal for our climate. The 2022 Harvard study of methane leakage in the Permian Basin, the largest fossil fuel production area in the country, found a leak rate of nine percent, which would make natural gas from this area three or four times worse for the climate than coal. Also, recent research has found when natural gas is cheaper, fossil fuel corporations tend to vent and flare more natural gas. By my estimate, during each of the last three years here in the Willamette Valley, we have had thirty</p>

	<p>days when the air was hazardous because of wildfire smoke. We are finding just how damaging these smoke particles are. It didn't used to be this way and the forecast for our air quality over the next decade is dismal. For the first time ever, I think of relocating from Eugene. Air and ocean temperatures skyrocketed last year leaving scientists without a good explanation, but most believe that methane is a major factor in this runaway heating. Please do not support a price increase that will be used to further expand natural gas infrastructure with increased methane emissions that degrade our health and our quality of life. Sincerely, Charles Areford 2386 Stansby Way Eugene, OR 97405 541-687-6978</p>
Christopher Hale	<p>Chair Decker, and Commissioners Tawney and Perkins, As an ER doctor, I see the impacts of the climate crisis firsthand. Our ERs overflow with patients suffocating from wildfire smoke. Tropical diseases work their way northward into our country. Record breaking temperatures cause heat stroke and death. As a father of two young children, I lose sleep worrying about the future they'll live in. Will it be a future of environmental collapse, worsening extreme weather, crop failure, political unrest over dwindling resources? Or will they live in an environmentally sustainable world? In order to leave a livable and enjoyable world for our children, we need to decarbonize our energy system as soon as possible. The only realistic and cost-effective way for gas utilities like NW natural comply with Oregon's climate goals is through investments in electrification. Unfortunately, NW Natural is continuing to use ratepayer dollars to offer exorbitant subsidies to connect homes and businesses to the gas system. Continuing to build new gas infrastructure is a waste of money when, in order to meet our state's climate goals, we need to stop expanding the gas system and start shrinking it immediately. I'm also troubled that NW Natural continues to pursue expensive, dangerous, and unrealistic energy sources like biogas and hydrogen blending. The claims the gas company has been making about the availability, costs, and benefits of so-called renewable natural gas and hydrogen are unrealistic at best, and deliberately misleading at worst. Additionally, they only delay our transition to a decarbonized energy system and puts huge financial risks on NW Natural's customers. Additionally, we Oregonians are already at great risk from the explosive nature of natural gas, given this region's very high likelihood of a massive earthquake that we are likely to experience in the next few decades. Remaining dependent on such a dangerous fuel source is a catastrophe waiting to happen. You already gave guidance in NW Natural's integrated resource plan,</p>

	<p>directing them to pursue electrification. It's imperative that you build on those directions. As a NW Natural customer, and an Oregonian, I want our utility to be focused on an electrification-based decarbonization strategy in line with expert analysis, relying on proven technology. Please reject NW Natural's proposal to increase ratepayer funded subsidies for new gas connections. These subsidies are outdated, expensive, and climate-damaging. I urge you to listen to the countless ratepayers, as well as local government leaders, who are calling for a managed transition to all electric homes and buildings, as soon as possible. The existential threat presented by the climate crisis requires that we take historically bold efforts NOW. You may be facing pressures to do nothing, or to be "politically safe" and choose a "middle ground." But in a crisis, choosing anything but the most ambitious and far-reaching plan is the unsafe choice. The decisions YOU make right now will decide the future our children live in. Thank you, Dr. Christopher Hale</p>
Nora Lehmann	<p>Chair Decker and Commissioners Tawney and Perkins, thank you for the opportunity to testify this evening. My name is Nora Lehmann, I'm a mom of two young children and tonight I'm speaking on behalf of Families for Climate. We are a grassroots non-profit mobilizing parents, kids and families for climate justice and a livable future for all. We request that the Commission reject Northwest Natural's attempt to expand their system of methane pipelines at their customers' expense, and at the expense of a livable climate for our children. A recent NOAA report¹ confirmed that in 2023 emissions of methane and carbon dioxide continued to surge to historic highs. Oregonian families are relying on decision-makers to set policy that ensures fossil fuel usage declines; not prop up false solutions like biogas and hydrogen blending, which have been demonstrated to be scarce, expensive, and dangerous. The plain fact is that in order to meet our climate targets, we must start shrinking the gas pipeline system not expanding it. Please build on your guidance from NW Natural's integrated resource plan by directing the utility to pursue electrification, which is the only feasible, proven path to meeting its decarbonization obligations. In the context of our fragile and rapidly devolving climate, and the fact that Oregon has yet to actually meet any of its GHG pollution reduction benchmarks², it's imperative to ensure that ratepayers aren't subsidizing the growth of fossil fuel infrastructure. Given this concern, we urge the commission to instruct NW Natural to discontinue its line extension allowance. As parents, grandparents, and caretakers, we have an obligation to do everything we can to</p>

	<p>protect our children's health and safety, and we thank the PUC for their work and for considering our testimony.</p> <p>https://research.noaa.gov/2024/04/05/no-sign-of-greenhouse-gases-increases-slowing-in-2023</p> <p>https://www.opb.org/article/2023/04/14/oregon-must-cut-more-greenhouse-gas-emissions-to-reach-climate-goal-panel-says/</p>
Barbara Sorrell	<p>Please quit giving these utilities huge raises. My husband and I are on a fixed income. We cannot afford another blow like this to our income. We have never seen such high utilities as we have seen the last year. It is getting very hard to pay. We don't bring in a lot of money we are not wealthy by a long shot. It is also very hard to pay for groceries as well. Also paying for the high increase in medical expenses we don't have any more money. I guess we could live on the streets. This is so ridiculous. Maybe they should reexamine on how they spend money. Also living in Multnomah County is very difficult as it is because of ridiculously high property taxes and water rates. If the increase happens I'm afraid we are going to have to move. I also understand some people don't like gas. We had an oil furnace prior to converting to gas. Gas is so much cleaner than oil. We could always smell the oil burning while using the furnace. So thankful we changed to gas. With my husband having multiple myeloma and now having to have aortic aneurysm surgery and me having to have a knee replacement. It is all too much. Please, please don't allow this to happen. Thank you, Barbara Sorrell</p>
Jane Stakehouse	<p>Chair Decker and Commissioners Tawney and Perkins. I am submitting my testimony in writing in the interest of time. Technical difficulties are unavoidable, and I appreciate you working around them to give the most people time to comment. I encourage you to review the testimony submitted by Dr. Pat DeLaquil on behalf of MCAT (Mobilizing Climate Action Together). I have been an active member of this group since it was formed to focus on climate pollution in Oregon. I am also a trained Climate Reality Project Leader and am horrified by the damage done to our environment by methane gas. I am certain you are aware scientists have calculated that methane is 80 times more potent than carbon dioxide in its impact on global warming. There are alternatives and we must do everything we can to convince the methane gas companies to decrease the use of gas. I live in a 99-year-old duplex in NE Portland. I am testifying on April 16, 2024, to ask that you deny the NW Gas Company's request for rate increases to expand their gas distribution system and to counter the risk to their shareholders related to changes in the industry. As a former</p>

	<p>NW Gas customer, I am not concerned for my own pocketbook. I had the gas line to my home cut in 2020. And yes, we have lived through power outages and survived as well as we did prior to removing the gas furnace and range. The gas furnaces need electricity to operate. My camping stove on the porch cooked as well as the old gas range. My home is well insulated and although it was a bit chilly, we put on extra clothes. Watch for the signs that signify all electric homes. We are growing in number. I ask you to deny the request for a rate increase because the last thing any of us need is more methane, so called 'renewable' or not, circulating beneath our streets, polluting our air, and endangering our neighborhoods. I am gas free but I still live next to pipes that could rupture or leak, catch fire or explode. So-called 'renewable' gas has the same fire and explosion potential and climate pollution. I was fortunate in that I could refinance at a low interest rate and complete the full Stackhouse electrification process at one time. I feel for low-income customers and renters who do not have that option. Customers should not have to pay for the short sightedness of their energy provider, especially those customers who have limited options. We must remember that the new gas installed today will be polluting well into the future. Several builders presented issues they have encountered with electricity and the electric utility companies. These are problems to be solved, not to justify additional gas. We must focus on building our clean energy generation and modernization of the electric transmission infrastructure. As the climate changes and we have more severe cold weather I may even be looking for battery backup. I will never go back to the polluting methane (fossil or new) that is destroying our climate and endangering future generations. NW Gas has viable business options if they could just get out of the mindset that they are in the business of piping gas into buildings. Denying the rate increase may help them consider other business models. I hope that you do so.</p>
<p>Travis Mills</p>	<p>I, Travis Mills, second what Mike Erdman, the second gentleman who testified, had to say and am in support of the line extension allowance proposal. Thanks, Travis Mills Regional Construction Manager</p>
<p>Desiree Dietz</p>	<p>With over \$93 million in profit, there is no reason for this rate increase. This will be a hardship for nearly all residents. The proposal is over \$150 for a year. For those making minimum wage that's nearly one and a half days of full-time work extra a year to pay this. Our community is already financial dire</p>

	straights due to corporate inflation based on greed and not actual socioeconomic inflation.
Lauren Bean	Nw natural should not increase rates more. It costs too much to heat my house. It costs me \$85 a month if I am not home and I set heat at 50 degrees for an entire month. If I use it, it is closing in on \$200 a month, which is more than I have paid to heat and cool my house, even when I lived in a home there times the size as the home I do now. They make a hefty profit, utilities should not profit huge sums on necessary services that endanger people's lives if they can't afford it.
William Lauer	I do NOT support the rate increase proposed by Northwest Natural. We need to reduce our fossil fuel impact on our environment rather than promoting it by subsidizing natural gas.
Amber Edwards	We just had a rate increase for electric now you want to increase our gas? How do you expect people to survive especially the elderly with price increases like this? Y'all should be ashamed of yourselves!
Mercer Moore	According to NW Natural's own publicly available financial results, their profit (net income) is up to \$93.9 million for 2023; higher than the previous year's \$86.3 million by a large margin. There is no justification for higher rates other than increased corporate profits. I firmly oppose the 18.8% increase as it prioritizes shareholder profits over providing the utility services to the public that is its theoretical goal.
Steven Jackson	I was reading the paper about a meeting for rate hike for NW Natural. I know seniors living in houses around me having to cut back on food to stay in their house. This rate increase is going to create a homeless crisis as we will have seniors living on the streets. The PUC needs to be smart with any rate hikes we decide on. If there is a rate hike I am going to find something that is not being done right. The PUC needs to keep seniors in mind. This rate hike is around 28-29%. I will do background checks and be all over the PUC if we allow the rate increase as we don't have the right to ask anymore of seniors.
NA	These rate increases disproportionately affect low income and residential customers. Northwest Natural should not be allowed to increase the rates beyond inflation rates if they are still posting a profit.
Leighton Paul	\$93 million dollars in profit last year? We absolutely do not need these rate hikes. I really hope you can make the right decision here. Thank you for your time!

Robert Uriardt	I am speaking for a lot of seniors on SS. It's hard enough to keep their homes w/ property taxes let alone with rates that keep increasing. Everyone at senior center feels the same way.
Ron Hyde	I'm certain the voting public were unaware of these costs, this is insane. If there is money for foreign aid, there is money to do this at zero cost to rate payers. If not to abolish this B.S., put it to vote again WITH the costs
Maureen Stone	I am concerned about NW Natural increasing their rates by 18% in Nov. I am on a fixed income so what is the PUC going to do? How to handle this? This rate increase is going to take seniors out of houses they have been in for 50 yrs as we can't afford these increases on a fixed income. This is ridiculous! The CEO's shouldn't get big raises and live like the rest of us. When on SS our income does not go up but utility rates do, it's not going to work!
Erik Andersson	Chair Decker, Commissioner Tawney, and Commissioner Perkins: The Strategic Economic Development Corporation (SEDCOR) shares our support for the Line Extension Allowance proposal from NW Natural. This Line Extension Allowance will provide the Mid-Willamette Valley region with a valuable resource which will help to attract and retain the traded sector businesses that are vital to our economy. SEDCOR is a nonprofit, regional economic development organization, working with private and public partners to enhance and diversify the Mid-Willamette Valley economy. As such, we are always seeking ways to improve opportunities to attract new businesses and support existing business growth. This Line Extension Allowance is in alignment with the strategic priorities upon which SEDCOR operates. SEDCOR supports healthy businesses, good jobs, and strong communities by finding, creating, and cultivating economic opportunities in Oregon's Willamette Valley. To carry any project across the finish line involves an expansive and intricate network of passionate people with a shared vision. Since 1982, SEDCOR has built and strengthened positive and productive partnerships with industry leaders, utility providers, nonprofits, business advocacy groups, community organizations, commodity boards, state and federal agencies, local governments, and more. That is why we are reaching out today to share our support for the Line Extension Allowance proposal from NW Natural. SEDCOR sees two significant and directly related Economic Development benefits to this proposal. Housing Availability: This first-of-its-kind approach prioritizes low emission homes while balancing the need for

	<p>housing growth in our state in a way that supports more affordability in building costs and energy security. As an economic development organization, we have heard time and again that access to workforce housing is a significant barrier to finding and retaining employees in traded sector work. When we see policies which aid in the growth and availability of accessible housing in our region, we feel obligated to share our voice on the matter. Business Expansion and Recruitment: It is not uncommon for SEDCOR to receive inquiries from businesses looking to expand existing operations, but where utility infrastructure challenges are a limiting factor. Likewise, when we receive recruitment inquiries, we must focus on areas where utility infrastructure can meet the needs of the business in question. This can limit our scope, which limits the potential for the region. NW Natural's Line Extension Allowance will provide the necessary growth of utility infrastructure into regions of our state that are ideal for economic development. We urge this commission's support and approval of NW Natural's Line Extension Allowance Proposal and hope that you will consider these economic development and community impacts alongside the additional messages of support received for this proposal. Thank you for your time and consideration. Sincerely, Erik Andersson, President</p>
<p>Jamie Reynolds Gordon Mandi Smith Jacqueline Hale JaNelle Samuels Ethan Beck Jessica Beatty John Maddalena Ian Nelson Travis Mulliniks Aaron McLaughlin Heather Randall Alana Ebert Brandon Ebert Keri Ebert Barry Claypool Samuel Erickson Brandy Wheelis Tracy Phipps Todd Janeczek Ramiel Anzu California Spencer Nichelle Thompson</p>	<p>Dear Public Comments Oregon Public Utility Commission, I am writing to comment on the NW Natural rate case (UG 490). As a NW Natural customer, I'm worried about how an 18% rate increase for residential customers will impact my household. An increase this large does not need to happen right now. Since 2020, NW Natural rates have increased by more than 50%. We cannot afford another big rate increase this winter. As the cost of living remains high, raising bills this much will have a significant negative impact on my household and fellow Oregonians. We have seen a growing pattern of Oregon's for-profit utilities asking for 15-20% increases nearly every year for the last four years. NW Natural and all other for-profit utilities should be subject to limited rate increases. I support the Oregon Citizens' Utility Board's proposal to limit rate increases to 7% plus inflation or 10%, whichever is lowest. I also do not want my bills to go toward expanding NW Natural's customer base. The Commission ruled in 2022 that NW Natural must reduce its expansion subsidy (the line extension allowance). The Commission also approved the elimination of Avista Gas's subsidy just last year. Please do not allow NW Natural to increase its subsidy to up to \$3,600. I urge the</p>

Ellon Manly Daniel Miller	Commission to reduce this increase wherever possible, create limits on rate increases, and make utility rates more affordable.
NA	Dear NW Natural - You already charge A LOT of money. Some of us are unable to pay for this ridiculous rate increase. Can you not see people are struggling? Is all about money for you? When will you ever have enough money to satisfy you? All companies want is the most possible money they can take, and take, and take from consumers. Please stop!! ENOUGH IS ENOUGH!! Maybe you could cut your CEO and CFO's salaries a tad. They are making tons of money!!!!!!!!!!
Vikki Cosentino	PUC, You have already raised rates 8% during the Pandemic and it is hurting residential customers. Two years ago, NW Natural put out a low income discount for consumers like myself due to the pandemic. Then people were hurting and struggling to pay their bills, Now you are trying to raise rates again another 18%, which will again hurt residential customers. As a consumer, and living on less than \$950 a month from Social Security. if NW Natural raises the gas rate another 18% (approximately \$24) consumers like myself will have to choose between certain essentials, like heating their home, food or medication. Making that choice for some people like myself, who has a disability it could be a deadly decision. I do not want to face consequences, because I had to make the choice between heating my home, medication, or food, I rely on these three basics. My income is tight. I not only provide for myself I provide for my service dog on the above income. I would not be able to do that with the proposed increase. Any utility company should not be allowed to raise their rate more than the COLA. The COLA 2023 what is 3.2%. You have more than doubled the increase for NW Natural already. Consumers like myself have a hard time affording things as it is because of inflation being at a 40 year high. Leave NW Natural rates where they are. An 18% increase will hit consumers like myself very hard.. A lot of it will go to shareholders which is wrong. The shareholders see enough profit. Consumers are hurting like I said above, NW Natural started a discount program for low income individuals during the pandemic, but now with a 18% proposed increase the discount would be more than wiped out. The proposed increase stinks of corporate greed. Leave the NW Natural rates where they are! Do not adjust them more than the COLA Rate!
Virginia Carr	To the he PUC - As a senior citizen living on a fixed income under 26,000.00 a year I need to point out with the cost of living unstable in Oregon I can't do much more! COLA 2023= 3.2. Other considerations: Looking at profit percentages of

	<p>'large corporations soaring and again the unstable economy with day to day expenses on the average up 30% (food fuel and other essentials). The fact that homeowner insurance in most of Oregon has increased by as much as 80% since 2020. The approved Portland General Electric increase 20 to 30 % this year must be considered. As it stands with PGE, we paid them to do their job (keeping lines safe) yet they didn't and now we are paying again for what they didn't do.... In closing, while I may not understand this, how is it the brunt falls on residential rates? "While residential rates would increase 18.8% under the proposal, commercial and industrial rates would be smaller. Small commercial accounts would see rates rise 16.8%, medium commercial rates would go up 9.0% and large commercial would increase 7.2%. Large industrial would go up 3.6%." Thank you for your consideration.</p>
Jennifer Valentine	<p>I am opposed and appalled to hear that NW Natural is back asking for an 18% residential rate increase. This is outrageous given they have been granted raises and seem to think that Oregonians can afford to either pay or freeze! The Oregon Citizens Utility Board, a consumer advocate group, said if the rate increase is approved as submitted, the company will have raised rates by 50% since 2020 . This is unfortunately not the only increase we have all seen since 2020 --from electric rates and food prices, to medicines we are all feeling the pinch in our daily routines. What or who suffers? We have less to spend in supporting our overall local economies --no theater, no movies, no eating out, no weekend getaways to the coast, no live music events, no extra purchases, etc. And for many, these cuts are more challenging when they are on social security income or minimum wage jobs --I have a good job and find it increasingly challenging to balance the budget each month. It has been hard to deal with the increases in monthly utility rates, from water to electric and now gas again!? Why are utilities not asking the legislature or our congress representatives for infrastructure dollars to support needed investments and upgrades?. Shouldn't we have put more dollars into our own state and not the pockets of the rich owners of these companies and the stock market? Asking the working people of Oregon to fix backlog in maintenance and additional construction is like wringing a dry rag. We should have long ago required the electric utilities in Oregon to pay to put solar panels on every roof possible to harness a more progressive future. Stop asking individuals to bear the brunt of what should be investment for the future. So many people are living on the edge these days, it doesn't take much to push someone out of their ability to stay housed and we've seen</p>

	<p>such high increases in utility prices in Oregon it makes me fear that while our legislature has been trying to invest in housing, there are more detabiliing forces hitting the average person. And I used to believe the PUC was on the side of the Oregonian--and so this current post-pandemic period has been really shocking and something I never thought I would see in Oregon --but it seems that the PUC has been more inclined to rubberstamp requests at the expense of the taxpayers and profits for the corporations. Please try to solve the needed investments in infrastructure without individuals can just continue to pay more and more. My utilities have more than doubled and I am a super-energy conscious type person. We keep the heat at 65 even on the coldest days, and turn it down lower at night. Still my bills didn't even show conservation. I participate in the electric alerts from PGE to reduce power use on days when surges are expected and while I shut down use of dishwashers, dryers, fans, and other things when a heat emergency hits, the "savings" I see is almost never over 5 cents for participating. I am clearly opposed to another rate increase. The current trend in the PUC to support these requests which have now doubled since 2020 is alarming.</p>
Damian Centanni	<p>Retired Truck Driver here, barely surviving on a 'fixed income' . I don't get ANY increase on my monthly Pension payments! Northwest Natural doesn't deserve ANOTHER gouging 18% increase! No! No more Rate Hikes, for a few years! This proposed Hike, will have raised my rates by 50% since 2020! Bull crap! Outrageous! LINE EXTENSION ALLOWANCES given to the already wealthy Home Developers, from MY hard-earned monthly payments, is APPALLING, and they should be embarrassed by even asking for Current Homeowners to foot-the-bill towards future not-yet-built developments is LUDICROUS! No More Rate Increases! Commissioners, stand with your current homeowners this time! Vote NO 18% increase!! Thank You in advance. Mr Centanni.</p>
NA	<p>The line extension allowance encourages new connections, which is contrary to Oregon's goal to reduce use of natural gas. I have solar panels and backup batteries which is a better solution. The line extension allowance should be done away with.</p>
Justen Maron	<p>My name is Justen Maron, partner with Olsen Communities LLC. We develop land and build custom homes in Salem and Monmouth. I attempted to address the commission at the public comment meeting Tuesday, but unfortunately had to jump off the call before my turn to speak. Below are my written</p>

	<p>comments: There are many aspects of this rate case, I would only like to comment on one: Please support the proposed Line Extension Allowance. As a developer and builder, we have a unique business model. We generally build every lot in our development, and we let people design a home that fits their lifestyle rather than force them into cookie cutter designs. That is especially true when it comes to appliances, heating types, and energy resilience. Our buyers are savvy, and want choices when it comes to how to heat their homes and water, cook their food, and prepare for power outages. In the last 12 months, we've built homes with heat pumps, gas furnaces, ductless systems, heat pump and tankless water heaters, as well as PV solar systems and gas generator backups. (lots of gas generators). Gone are the days of a builder like us specifying what appliances get used in a home. We have to embrace that change is happening, and the customer wants to choose the mechanicals in their home. We are under construction of our 5th phase of development at Fairview Addition in Salem. Because it has been a couple years since our last phase was built, we were totally shocked to get a \$24k invoice for the current line extension. That adds about \$1000 to our COST on every lot we develop, even more if we don't install gas furnaces in every home! With the current LEA plan, this will only increase in future phases. The new proposal gives consumers the power to choose, and helps keep development costs from growing even higher. I thank you for considering this forward thinking proposal, which emphasizes redundancy and consumer choice, and actually targets lower overall gas consumption. This proposal incentivizes more hookups, with fewer therms consumed, which feels like a compromise that both sides could agree on. Thank you again for your time and consideration.</p>
<p>NA</p>	<p>Hello, I am a Salem resident and homeowner and am so scared of this possible rate increase. They're a for profit company, so clearly the increase is to just pocket morw money for the investors and higher ups!? I can barely afford the pge massive increase that somehow was allowed to pass. Pge is basically owned by blackrock, might I add. Anyways, I am against this rate increase because it hurts people and hurts families. I can guarantee you that the \$8 decrease in the average bill last year was because of cost, not northweat natural buying cheaper gas! Where will it stop?</p>
<p>Julie Tourtellotte</p>	<p>I strongly oppose the rate increase being asked for by Northwest Natural. In my opinion, environmental concerns must come first right now, and supporting this industry is not in</p>

	<p>keeping with those concerns. As Josh Salinger argued, supporting sustainability in housing construction is what will be both environmentally sound and cost effective in the long run. Please consider the long term effects of your decisions. Thank you.</p>
Arielle White	<p>Hello, and thank you for your time. I've just read about NW Natural's proposed residential rate increase of 18%, and I'm shocked, and definitely not in favor of this. Between the overall cost of living and PGE's recent rate increases, utility companies in Oregon are sapping people's incomes and making it even more difficult to afford living. Per Statesman Journal article, this increase would likely bring them an additional \$159.4 MILLION. "Unfortunately, we have seen a growing pattern of Oregon's for-profit utilities asking for 15-20% increases nearly every year for the last four years," the CUB said in a statement. Among the investments the company is seeking to make are \$21 million in software updates, \$13.3 million in office building upgrades and \$9 million for a pipe replacement on the north Oregon Coast." These cited upgrades, while I'm sure are not the complete list, total to \$43.3 million. \$159.4 - \$43.3 and they've got an additional \$116 million. Where does that go? Executives' pockets? I cited the PGE rate increase because I am one adult living with one other adult. We don't use excessive amounts of power. While our highest bill happened during winter, after the rate increase, we hit a new high of \$237 for one month. Maybe other households would not consider that high but again: We are two adults who do not run electronics in rooms we're not in. At most, when it's dark we have a light on in the rooms we're in, plus maybe one other and our outdoor lights. If gas prices are hiked 18%, I don't know how we're supposed to stay warm in the colder months; we also do not set our thermostat higher than 69 degrees during winter. Instead, we'll put on additional layers and switch on low-power-usage space heaters. We are existing during a time where wages are stagnant or increases, when they happen, cannot keep pace with cost of living increases; plenty of companies are price gouging us just because they can, while calling it inflation. There's insufficient consumer protections, and our government largely doesn't seem to care all that much. Please do not allow this rate increase to pass.</p>
Anita Huffman	<p>Thank you for the opportunity to comment. I'd like assurances from NW Natural that if the proposed 18% rate increase is approved that it would be specifically tied to the infrastructure proposed and not into the general fund of the company. If it is</p>

	<p>ties to specific projects that they provide budget projections and other economic forecasts to show how patrons money is being spent. With record profits, its unjust to charge consumers such a high additional charge, one that exceeds the current inflation rate and is quite onerous to consumers, particularly in light of all other utilities and property tax levys on the table. Wages are not going up to keep up with the rate increases! As to the additional charges to offset line hook ups, I feel that is in direct conflict with the States efforts to reduce our carbon footprint. It's well known that gas appliances are not able to run on clean energy, and many are tied to the electrical grid as it is. In the event of power outages, many gas appliances will not be operable and building new housing to accommodate a likely outdated source is irresponsible. Just as electric vehicles will be the norm in 15-20 years, clean energy appliances will also become the norm. As consumers, we are not going to be giving up electric/battery power, so it doesn't make sense to steer new home buyers into a system that will be obsolete within the potential life span of the appliances they'll be hooking up to those gas lines. It's not a justifiable expense to charge consumers for a rebate to the developers. Again, considering interest rates and housing costs, there is little to no value added to the consumer and all to the developers and NW Natural. Additionally, spreading that cost on to existing customers is like a tax on us. I encourage you to deny these proposed increases. Unfortunately I have been unable to research the justification for the proposed rate increase, but I'd like to think that the PUC has looked at the financial proposals. I worked as a Regulator issuing permits for certain development and improvements and part of the review included a justification of purpose and need for the project. To determine if it was in the public interest, and that included financial disclosures. If the PUC looks at that in their decision making, I'd say NW Natural isn't meeting the public interest at this time and the double digit rate increase should be denied. The proposed rate increase to offset new hook up incentives also does not fit within the public interest when there are better, more viable options for services. Thank you for considering my comments.</p>
Mark Hoops	<p>I am totally against significant increases to support Northwest natural gas. Nearly 50% increase over the last few years with this new proposal. Any people are on fixed and limited incomes and cannot afford this additional Levy.</p>
Tammy Lofgren	<p>To whom it may concern, Residential gas usage should show the least increase, there are many on fixed incomes and since</p>

	<p>the federal government is trying to not allow new construction with gas appliances, we need to survive. My husband is a double amputee and has to be kept at a comfortable temperature during the winter time. Please, NW Natural has been showing a profit for years, please have mercy on those of us who are heading into our golden years and not getting cost of living raises in income. Thanks for your consideration in this matter.</p>
Gina Roman	<p>To whom this may concern, My name is Gina Roman and I am a citizen of Portland. I am concerned about the egregious rate increase proposed by NW Natural and am writing in strong opposition to this proposal. We are living in a time where it has become increasingly expensive, and honestly downright unsustainable, to live in Portland. Inflation continues to persist with the cost of staple pantry items at an all time high, Childcare rates are astronomical, housing inventory is at an all-time low with historically high interest rates, and we have one of the highest rates of taxation in the country. With all of these headwinds, NW Natural already posted record breaking profits last fiscal year.</p> <p>https://ir.nwnaturalholdings.com/news/news-details/2024/NW-Natural-Holdings-Reports-Fourth-Quarter-and-Full-Year-2023-Results/default.aspx</p> <p>This is a prime example of corporate greed shrouded in necessary "infrastructure improvements". Please consider the people who will shoulder this burden, the customers and reject this rate increase proposal.</p>
Cadyнна Adair	<p>Why is it that the residents are paying a greater percentage then businesses?</p>
Dianne Clay	<p>Chair Decker and Commissioners Tawney and Perkins. Thank you for the opportunity to provide testimony today. Hello, my name is Dianne Clay, I live in North Portland and have been residing in North Portland for about 30 plus years and I am a valued customer of NW Natural. As a customer of NW Natural I rely on gas for my daily living. Gas heats up my home as well as the main source of heat for my water. I do want to show my appreciation for NW Natural for when I call expressing my concern of having a gas leak or to restart my gas? replace. NW Natural responds in a quick manner. However, rate increases are hurting my family and the community around me. I believe utility companies should manage costs in ways that center communities rather than investors. I, myself spending more money on utilities, and less on my daily essentials like food, household items and other bills. I also think rate increases would elevate stress and trauma. The</p>

	<p>trauma comes up for me growing up in poverty and having the gas shut off. Having anxiety about making sure my children never experience being extremely cold and wearing layers of clothes to keep warm. I also experienced grandma not having utility service. This caused an extreme amount of stress during the snowstorm. She was cold and in the dark, luckily we were able to get to her to provide candles and additional blankets to keep her warm. Grandma like many others are on a fixed income and rate increase will be a burden to her health and everyday living. Based on my experience I ask the commissioners to not approve the rate increase. If the commissioners don't take action, the harm for low-income families and communities will cause extreme stress and trauma. Especially for families living on a budget. Thank you, commissioners, for taking the time to listen to my testimony. I hope this information will let you know how the rising cost is affecting me and other people in my community.</p>
Theodora Tsongas	<p>Greetings Chair Decker, and Commissioners Tawney and Perkins, Thank you for the opportunity to provide comments. I am Dr. Theodora Tsongas, an environmental health scientist with a career in public health. I am a member of Oregon Physicians for Social Responsibility and the Environment Section and the Climate and Health Committee of the American Public Health Association. I am testifying today because of my concern that NW Natural is once again attempting to fund its corporate profits for the benefit of its shareholders by increasing costs for its ratepayers with no significant benefit to those ratepayers. Second, NW Natural has not complied with your directions, and it is simply proposing false solutions like biogas and hydrogen blending which are not proven and are known to have many health and safety drawbacks, as well as continuing to rely on fossil fuels for their production. Real climate solutions can enhance public health. NW Natural is dragging its feet because it knows that its time is short: it is a fossil fuel company and it does not want to adjust to the reality of our need to make significant changes in order to adapt to the climate emergency. But when we listen to their assertions, we are in danger of being saddled with stranded assets, and of wasting precious time and dollars on false solutions to climate change, when we have less expensive and cleaner solutions in solar, wind, and battery storage technology available now. According to the CUB: "NW Natural is attempting to create a new billing structure where customers in buildings with new gas hookups pay almost 200% more than existing gas customers. With the proposed change, an existing customer pays a \$10 flat fee for</p>

	<p>service. Meanwhile, a customer living in a building added to the gas system after November 2024 would pay a \$26.25 flat fee for service. If implemented, this would mean that moving to a new home could wildly increase the amount you are paying for gas. And this different rate would continue forever. Imagine five years from now moving to a home of the same size, using the same amount of gas, and having your gas bill double because someone this year decided to hook up to NW Natural's system. As Oregon sets out to build more housing across the state, this could pose a real threat to the affordability of living in new construction. Affordable housing projects are not excluded from this proposal, meaning low-income families could be paying the price for a housing developer's choice to install a gas stove. Because of the subsidy for new hookups outlined above, developers have a real incentive to install gas appliances. The combination of more money for new gas hookups and higher rates for those who live in these buildings is a disaster for customers. These proposals by NW Natural are not only inequitable and unjust, adversely affecting those members of our community in greatest need of adequate, safe, and healthy housing, but also ignore the affordable housing crisis we are facing. And, in the context of state climate goals, it is critical that ratepayers are not paying to subsidize the expansion of the fossil fuel infrastructure system. Please reject NW Natural's proposals, eliminate its subsidy for new hookups, and send them back to the drawing board until they seriously address real climate solutions. Please reject NW Natural's deeply flawed proposal that will prop up its polluting gas system in the face of emission reduction obligations by expanding its system and relying on expensive false solutions like biomethane and hydrogen blending. Thank you for your time and consideration of our concerns, and for your very hard work monitoring and controlling what is in fact, a monopoly. We do not have a choice of utility providers; you are the only resource we have to keep costs and services sustainable and affordable. Thank you.</p> <p>https://oregoncub.org/news/blog/nw-natural-asks-for-an-18-rate-increase-for-oregon-households/2970/</p>
<p>Carla Penn-Hopson</p>	<p>Dear Public Comments Oregon Public Utility Commission, I am writing to comment on the NW Natural rate case (UG 490). As a NW Natural customer, I'm worried about how an 18% rate increase for residential customers will impact my household. An increase this large does not need to happen right now. Since 2020, NW Natural rates have increased by more than 50%. We cannot afford another big rate increase this winter.</p>

	<p>As the cost of living remains high, raising bills this much will have a significant negative impact on my household and fellow Oregonians. We have seen a growing pattern of Oregon's for-profit utilities asking for 15-20% increases nearly every year for the last four years. NW Natural and all other for-profit utilities should be subject to limited rate increases. I support the Oregon Citizens' Utility Board's proposal to limit rate increases to 7% plus inflation or 10%, whichever is lowest. I also do not want my bills to go toward expanding NW Natural's customer base. The Commission ruled in 2022 that NW Natural must reduce its expansion subsidy (the line extension allowance). The Commission also approved the elimination of Avista Gas's subsidy just last year. Please do not allow NW Natural to increase its subsidy to up to \$3,600. I urge the Commission to reduce this increase wherever possible, create limits on rate increases, and make utility rates more affordable. Sincerely, Mrs. Carla Penn-Hopson</p>
NA	<p>THIS INCREASE REQUEST IS EXORBITANT! I CAN JUST BARELY PAY MY CURRENT BILL WHICH AVERAGES \$150 PER MONTH! Another \$27 per month will break my budget! So much for increases in Social Security! Filing for Bankruptcy may be my only option...ugh!</p>
Aidan May	<p>Dear Public Comments Oregon Public Utility Commission, I am writing to comment on the NW Natural rate case (UG 490). As a NW Natural customer, I'm worried about how an 18% rate increase for residential customers will impact my household. An increase this large does not need to happen right now. Since 2020, NW Natural rates have increased by more than 50%. We cannot afford another big rate increase this winter. As the cost of living remains high, raising bills this much will have a significant negative impact on my household and fellow Oregonians. We have seen a growing pattern of Oregon's for-profit utilities asking for 15-20% increases nearly every year for the last four years. NW Natural and all other for-profit utilities should be subject to limited rate increases. I support the Oregon Citizens' Utility Board's proposal to limit rate increases to 7% plus inflation or 10%, whichever is lowest. And even that seems like more than necessary! I also do not want my bills to go toward expanding NW Natural's customer base. The Commission ruled in 2022 that NW Natural must reduce its expansion subsidy (the line extension allowance). The Commission also approved the elimination of Avista Gas's subsidy just last year. Please do not allow NW Natural to increase its subsidy to up to \$3,600. This would be ridiculous for normal Oregonians like me. I urge the Commission to</p>

	reduce this increase wherever possible, create limits on rate increases, and make utility rates more affordable.
Patrick Vanderhout	I'm against the NW Natural Rate increase, I sent a comment before on this topic but was registered as general comment not opposing a docket proposal. I don't know what the solution is between rising inflation and other standard of living costs, I can't see why these increases can be a little more less harsh then they are, it seems these days there is no room for innovation or that lack of vision thing. I know the State wants to go green and remove itself entirely from fossil fuels in ten years and which is squeezing NW Natural to raise rates in order to compensate the Environmentalist needs, but in the mean time people still to need to heat their homes and cook their food etc. Not to mention Portland is the Country's most Foodie City, most Restaurants here depend on Natural Gas to cook their dishes economically and palate wise, that would definitely effect the Restaurant Industry not to mention other businesses. There is nothing wrong with the 'vision thing' but rather how you apply it over time and make the transition as less painful as possible.
Web Joyce	It is totally inappropriate to them to ask for a rate increase. All the utilities need to live within their means. My husband and I live on a fixed income and we are seniors. They need to space out their spending. I am a 5th generation Oregonian and is seriously considering leaving the state.
Jason Burns	Dear Chair Decker, Commissioners Tawney, and Perkins, In an ever-changing world, options are important. Most of us have one or more vehicles at our disposal. We as human beings like to have a backup plan. We have more than one pair of shoes. Anything that is essential when often plan to keep the old one when we get a new one just so we have two options. We are urged to keep a bag in our vehicles. Why should we not plan the same way with how we heat our house? Having both gas and electricity as a heat source in a home allows the homeowner to have the same choice. I'm have been a president of a central Willamette Valley heating and cooling company for the last 19 years. We serve from Detroit to Dallas and Woodburn to Albany. We have lived through the 2020 fires as well as the 2021 ice storm and the summer wind storms that now cause the power to be turned off on a hot day. We regularly instruct our customers that you can't run a heat pump without a super big generator. And their electric furnace is not going to work at all without electricity from the grid. The future is dual fuel. Despite how much the future claims to be electricity. We, as a society, will have to

take a step back if we think that electricity can supply all our needs. Rationing, limited electrical usage, controlling when we use electricity, these are not things the most prosperous nation in the world should have to do. Those are the things we expect from our southern neighbor. There is no way to provide all the heat needed in a home, all of the electrical needs of a home and electrify transportation at the same time we continue to restrict the means of electric generation. The past has been dual fuel. Wood, coal, sawdust, oil. Then natural gas and electricity. If we limit the future, you can guarantee that people will figure out ways to go back to other options when they are cold. None of those options are as clean as a 95% gas furnace. With dual fuel, we create people who have the ability to chose how they heat there home and also have the ability to be resilient when events happen that limit their access to the grid. What do we want as citizens of this state. People who are completely depend on one fuel and if that fuel is scarce they just have to go without or do we want people who can survive on their own because they have choices and ability to take care of themselves in a crisis. Many crisis arise due to extreme weather. Depending on solar and battery at those times are very limited back up means. They might last a day but after that they are useless. Not to mention the fact that any electric vehicles are suddenly bricks so someone cannot even relocate if needed. Dual fuel creates multiple options for a homeowner to survive without calling for help. We are experiencing power outages in the summer months even now. Many people are installing generators to provide them power when none comes through the lines. They install natural gas or propane knowing that when the generator comes on it will not run their heat pump. These people want to do what is right for our future but also want that generator to provide power when it is not provided to them. Most customers install 95% efficient furnaces in their home. These become backup heat sources when paired with a heat pump. Without these gas furnaces we could be relying on electricity generated by emergency backup natural gas power plants that are only 60% efficient at best before we even mention power line losses. I would much rather run a backup gas furnace at 95% then a natural gas power plant assuming that natural gas power plant is even an option we have. I know the future does not allow this option. Many customer are choosing generators because they know this. Therefore, I believe that Northwest Natural has worked really hard to provide an option for their customers that helps all parties. I know for a fact that the electric utilities do not want all of the heating load on the electric grid. By approving this

	<p>LEA you will be enabling Northwest Natural to be able to provide resilience to many people that otherwise would be solely dependent on a electric utility or emergency services in a time of crisis. We urge support and approval of NW Natural's LEA proposal that enables a dual fuel future and gives homeowners the choice for resilience! If I can be of any assistance in anyway, please don't hesitate to reach out.</p>
<p>Howard Bell Executive Officer/Secretary Treasurer, OPEIU Local 11 Cale Doney Land Acquisition & Development Manager, Sage Built Homes Mike Erdmann CEO, Home Builders Association of Marion & Polk Counties Oleg Foksha President/CEO, Foksha Homes Inc. Jason Fussell Business Manager, Ironworkers Local 29 Tom Hoffert CEO, Salem Area Chamber of Commerce Roseann Johnson Entitlements Manager, Lennar Northwest, LLC Andre Makarenko President, Comfort Homes, LLC Jeremy Osterholm President, Ostercraft Homes Deanna Palm President/CEO, Washington County Chamber of Commerce Kelly Ritz President, Stone Bridge Homes NW</p>	<p>Re: UG-490, On behalf of 14 organizations and individuals representing thousands of people in Oregon Chair Decker, Commissioner Tawney, and Commissioner Perkins: We are representatives of business and community leaders, workers, and housing and economic development professionals who wake up each day focused on the details of building and remodeling, technological innovations, and the systems that make communities and buildings work. That's why we're coming together today to share our support for the Line Extension Allowance proposal from NW Natural. This first-of-its-kind approach prioritizes low emission homes while balancing the need for housing growth in our state in a way that supports more affordability in building costs and energy security. In this model, low-use gas appliances don't compete with efficient heat pumps they complement them. And they offer a reliability benefit for when the power is out it's a win-win. The Line Extension Allowance is not a subsidy. Builders receive no money from NW Natural or anyone else. New low use customers will cover 100% of their costs to be added to the system and carbon compliance costs, yet their overall bill stays lower because of reduced usage. Existing customers benefit because the new customer is helping absorb some of the fixed costs of the system. Just as we rely on the Commission's allowed electric Line Extension Allowance to connect power to new homes, we need a fair natural gas Line Extension Allowance to ensure access to low-emissions equipment that offers greater resiliency to all Oregonians. We need regulatory support to meet our state's top priorities: Housing affordability is important to Oregonians. We know that Governor Kotek is focused on actions that will increase housing and affordability options. Homeowners that have high efficiency gas equipment pay less than those who have to rely only on electric heating for those coldest winter days. Resiliency for all is needed in our region. We know that energy reliability is a priority for residents and businesses, especially during extreme conditions. Gas appliances like many water heaters, fireplaces, cooktops, and generators work when the power is out that's part of the reason why customers choose them. With this proposed Line Extension Allowance, more</p>

<p>Craig Schuck Vice President, Riverside Homes, LLC Jim Standing President, Westland Industries, Inc Russ Tiedeman COO, Pacific Lifestyle Homes</p>	<p>homes at lower price points will have access to high-performing gas equipment that works when the power is out not just the most expensive houses for wealthier Oregonians. The proposed Line Extension Allowance provides support for building more resilient neighborhoods while also lowering emissions. Our customers want choices. Each house that's built represents hundreds of choices that are made about the unique materials, tools and equipment used. Customers buy homes that reflect what they need and want, and what works for their families. We know what our customers want to purchase and that's why we make the decisions we do when building homes. We hope our state's regulators will consider our experience and what customers want when implementing policies that affect housing development. We recognize that housing and energy planning is complex work. But now more than ever we need support for ensuring smart, pragmatic energy options, which is why we ask you to approve the Line Extension Allowance of you now. Oregon's housing, economic development and community leaders need to ensure we are decarbonizing in a way that's affordable and reliable for our customers this proposal is structured to do just that. Thank you in advance for your consideration. Please see below organizational list.</p>
<p>James D Reed</p>	<p>I am writing to comment on the proposed rate increase for NW natural. I do not think it is in the best interests of the State of Oregon or the people of the state to continue to allow such steep increases for utilities. This is going to push the disenfranchised people further down and possibly out of their homes into homelessness. This is also straining the middle class and going to cause even more tension due to people being pushed to the brink. If you want to push all the people to the point of rebellion continue to Push the tax and rate payers further with 20 and 30% rate increase yearly. These constant rate increases are not sustainable for the people of the state and are not necessary for the stockholders of these companies with yearly profits spiking in all energy sectors. I urge you to deny this rate increase as it is unfair and not needed. You allowed 2 increased within a year spanning this and last year.</p>
<p>Chelsea Alatraste Martinez</p>	<p>Dear Oregon Public Utility Commission, I'd like my comments to be included in staff's supplemental opening testimony in this docket: I'm Chelsea Alatraste Martinez, and serve as Board Secretary for Fair Oregon Utility Rates for Small Business (FOUR). As a lifelong Oregonian born and raised in Newport, I understand the vital role small businesses play in rural</p>

communities. My parents are small business owners, and together we own and operate restaurants in Newport and Corvallis. My family business relies on natural gas to cook the food we sell to our customers, heat our dining area, and operate as a local business. My connection to the restaurant industry provides me with valuable insights into the needs of the small business commercial class. On behalf of FOUR, I am writing to advocate for the fair treatment of small commercial customers amidst Oregon's efforts to decarbonize its energy supply. It is important that small businesses are not unfairly burdened by the financial implications of these decisions. We urge the Staff to conduct a thorough review of the cost-of-service analysis for small commercial customers to ensure that smaller users are not subsidizing larger users. Specifically, we are interested in the evaluation of the Company's analysis of the RS 3 Cost Study. We would appreciate any comments from the Staff regarding their identification of concerns about rate shock, especially where natural gas is only one of the many significant operating utility expenses of a small business. Thank you for your attention to these important matters.
Sincerely, Chelsea Alatraste Martinez Board Secretary, Fair Oregon Utility Rates for Small Business (FOUR)

Public Comment Hearing

April 16, 2024

6:00 pm

Virtual

Transcript of the meeting available at: [Transcript of April 16, 2024 Pubic Comment Hearing](#)

Public Comments Received:

- 1. Max Bonder:** I'm here today on behalf of David Weekley Homes, which is a local homebuilder here in this area. I'm here to speak in support of the line extension allowance increase for Northwest Natural. The reason I'm here today is I deal in land development. In our recent interactions with Portland General Electric and Columbia River PUD, I've highlighted electrical system limitations and capacity issues that necessitate costly electrical infrastructure upgrades. These challenges potentially limit development on otherwise developable land. The financial burdens associated with these upgrades will inevitably be passed on to future homeowners, substantially raising construction costs and increasing both initial home prices and ongoing utility expenses. Additionally, the issues of home affordability is further exacerbated as less expensive gas appliances are being replaced by more costly electrical appliances. I'm here to strongly advocate for maintaining or increasing the Northwest Natural line extension allowance and urge complete transparency from electrical companies and Northwest Natural regarding their installation, energization and extension costs for new subdivisions. For example, last year our payments to Portland General Electric included significant and unclear overhead charges on top of material and labor costs. To our knowledge, there's currently zero accountability for PGE's or Northwest Natural's installation and extension costs charged to developers. We are observing a massive increase in utility installation costs from these companies coupled with decrease in extension allowances, which underscores a profound need for regulatory oversight and transparency in this area. We appreciate your attention to these issues and are just hoping for more transparency from these utility companies. Thank you.
- 2. Mike Erdmann:** I am with the Home Builder's Association of Marion and Polk Counties, and we represent builders in the greater Salem area, and I'm here tonight to support the line extension allowance (inaudible) as proposed by Northwest Natural in the filing. Our concern is that without these changes to the LEAs, we're concerned that developers, you know, particularly those that develop more modestly priced new housing, will not be able to afford to run gas to those new subdivisions, and so that denies those home buyers the choice in energy options that they clearly want, but frankly, more importantly, it puts them at greater risk by denying them the energy resiliency that they need during power outages. And from a personal point of view, I've got experience with that, you know, three years ago I went through an eight-day power outage, all hotel rooms were booked between Eugene and Vancouver as a result, and -- and, frankly, it was my gas fireplace provided enough warmth to allow the family to stay somewhat comfortable in the home. And I know that countless others experienced much of the same during that recent ice storm we had a couple of months ago. And so what we're experiencing is that our builders are reporting a significant increase in recent months in customers that want to put in a natural gas backup generator for future power outages, even though they may be relying on an electric heat pump for their

HVAC system. So, while the LEA changes provide for a greater energy choice and resiliency, you know, of course the changes also push homebuilders towards greater electrification by providing that financial incentive for builders to minimize the use of gas in new homes. And we believe, as an association, this strikes an appropriate balance between greater electrification and energy resiliency. And, of course, that benefits home buyers by ensuring they retain that energy choice and have that resiliency provided by gas service to the home. And finally, I want to stress that these line extension allowances are not subsidies provided to developers, they're ultimately paid for by the very customers that connect to the gas system in that subdivision, and that, frankly, further reducing or even eliminating those line extension allowances increases development costs, and that makes housing more expensive, and ultimately conflicts with the Governor's goal of both increasing housing production and making housing more affordable. And, of course, existing Northwest Natural customers benefit because the additional new hookups help absorb some of the fixed costs of the system. So, I'll wrap it up. We would just urge the Commission to support the changes to the line extension allowances contained in the -- in the filing.

3. **Jed Bennet:** So, I'd also like to dovetail onto the last two folks in their support of the line extension allowances as part of Northwest Natural's filing. I am a developer and homebuilder that targets the first-time home buyer. That said, my homes are priced at the lower end of the market, and my customers' income is also on the lower end. As you might imagine, every dollar counts in this market segment. With reduced allowances this past year, I was experiencing gas connection charges as high as \$1,800 per home. Because of this cost, I had to make gas and gas appliances an option that my customers could choose if they could afford the additional cost. In many cases, my buyers could not afford any additional costs, so they did not have gas installed to their new homes. Because the current line extension allowances are decreasing each year and are on a path to zero, I'm having to make hard decisions in whether to pay for natural gas to be installed in my new subdivisions. Allowances used to cover the cost of Northwest Natural Gas to install their services -- excuse me, allowances used to cover the cost of Northwest Natural to install their services, but now the cost is being borne by developers. It used to be covered by 'em. With that said, if a line extension allowance, like the one proposed by Northwest Natural, is not approved, we will see housing to our lowest income levels installed without gas, whereas more affluent home buyers who can afford the additional cost will be able to pay for gas and gas appliances. This inequity will be realized in their -- when there are power outages, and those that have been able to afford energy resiliency that natural gas provides have warm homes and hot water, while those who cannot afford natural gas will suffer. I am very much in support of the proposed line extension allowances and ensuring that home buyers at all income levels have access to the energy resiliency afforded by natural gas. So, with that said, again, I'd like to support the line extension allowances that are proposed by Northwest Natural, and I'm certainly available for any questions.
4. **Dineen O'Rourke:** I am the campaign manager for 350 PDX. Thanks for the opportunity to testify this evening. So, 350 PDX is a people powered grassroots organization that's been working in our region for over 10 years. We are fighting the causes of the climate crisis through justice-based solutions. I am testifying today to request that the Commission reject Northwest Natural's deeply flawed proposal. Northwest Natural' proposal will prop up its polluting gas system in the face of emission reduction obligations by expanding its system

and relying on expensive false solutions like biomethane and hydrogen blending. I am one of many, many people who are concerned about the unrealistic and misleading claims gas companies have been making about the availability, costs and benefits of so called renewable natural gas and hydrogen. I hope that the Commission will be skeptical of Northwest Natural's plans to rely on and promote renewable natural gas and hydrogen promises. It is clear that the only feasible and cost-efficient pathway for gas utilities like Northwest Natural is to comply with the State of Oregon's climate goals and decarbonize the gas system through investments in electrification. It is critical that ratepayers are not paying to subsidize the expansion of fossil fuel infrastructure. In light of this, I am asking that the Commission order Northwest Natural to eliminate its line extension allowance. It has become clear that Northwest Natural is continuing to use ratepayer dollars to offer exorbitant subsidies to connect homes and businesses to the gas system.

5. **Justin Wood:** I am a -- I'm an entry level homebuilder in the city of Portland. My primary construction market is in-fill middle housing, entry level product that's geared for the first-time home buyer. I also had the pleasure of serving on Governor Kotek's Housing Production Advisory Council, I was one of the council members. And one of the things that we prided ourselves on was trying to figure out ways to provide -- to increase housing production in the state, but also increase housing affordability and options for entry level home buyers. So one of the things that I find in the products that we build, is we really try to find what is the best option for how to provide housing to that entry level housing market. And when we look at all the options that we provide, it really is providing an option that's both a mix of natural gas and power. As we've created more and more housing recently, we've found that the heating systems have become better and more prepared to be able to serve the housing needs for what we need to do, but we also have to blend that with other options for backup gas sources for heating options, also for cooking options, and quite honestly, the water -- hot water usage is quite -- is -- the best option for heating hot water right now is through natural gas. And so I guess I'm testifying in support of the line extension allowance because I think what Northwest Natural is trying to do is really trying to balance the need for understanding that there is a -- there is a desire to reduce the carbon footprint across our state and across our region, but also trying to balance that with the need for having redundancy and options for home buyers. And so I think this strikes a good balance and that is it incentivizes us to use less gas, but also incentivizes people to be able to figure out a way to do both. And so I'm asking that you figure out a way to support this so that we can provide our entry level home buyers with this best option. A couple things that I would just like to point out, in addition to building in the Oregon market, I have built homes in Washington, and currently in Washington, the Washington Code has pushed us to an almost all electric new construction system, and we have found quite a lot of problems with that. The most recent weather when we had back in this winter when we had, you know, close to, you know, below zero temperatures for a while, especially in the eastern part of Washington, we had a lot of home buyers that had a lot of issues with their all electric heating systems, and we actually had to figure out ways to provide them backup and temporary heat, as you heard from somebody else mentioned as well earlier today. So, it just illustrates the importance of providing redundancy and options for both of our home buyers. And then there's been some conversations about the allowances that's been given from the ratepayers. I would just like to point out as well that we get these allowances from Northwest Natural, which is offset by the cost of the new construction that we pay to put in our homes,

but this isn't unique to Northwest Natural Gas, we also get line extension allowances from the power companies that we work with as well, so we get line extension allowances from Portland General Electric, Pacific Power and all the other utilities, so that's a common thing. So, I think thing is consistent with what happens from other utility providers across the state. So, again, I'd just like to thank you for your time and, you know, stress my support and the need for this for us to be able to continue to provide entry level affordable housing for people in our state. Thank you.

6. **Randy Sebastian:** I am also a homebuilder, and I agree with my -- my other peers in allowing clients, our new homeowners, to have options for heating water and also cooking. I have got a different business model. My homes start around two million dollars. My clients will demand gas no matter what, and most of our homes have included natural gas fired furnaces -- or, excuse me, natural gas fired generators or they're wired for them. And my concern is not for me, but it's for the other builders that are trying to provide options for their clients. And I see it turning into a "haves" and "haves-not" situation. And the most energy efficient way to heat water is through gas, and the only way we can have a backup generator, truly, is gas or propane. And so I really think that by giving -- by allowing the gas company to do the increase in the allowances for the extensions, allows homeowners to continue to get what they -- what they need at an affordable price. I've been building homes for 40 years, and I've seen since 1984 permits in the city -- I know it's -- we're not talking about permits -- but permits in the City of Portland, I could get them in one day and they're \$800. Now they're six months and \$70,000. So, I think everybody in power positions like you guys need to really look at what -- what happens when you make decisions on affordability. Housing affordability is really being hurt by all these regulations, so I think if there's any way you can help give some relief to housing costs, you could do it and you could do it here. So, thank you.
7. **Pat Delaquil:** I am an energy systems modeler and climate policy analyst, and I'm submitting this testimony on behalf of MCAT (Mobilizing Climate Action Together), which is a community of about 500 volunteers working on advancing healthy climate and a green energy economy for future generations. As I testified to the Committee during the recent Northwest Natural IRP CEP docket, multiple reports from multiple international and national groups studying the potential for long-term decarbonization pathways have consistently identified four core strategies to the most cost effective and economically beneficial pathway:
1. Achieving 100% clean electricity generation;
 2. Converting our transportation fleet to electric vehicles;
 3. Converting our buildings and industry, where feasible, to electricity; and
 4. Developing carbon free fuels for long-term storage reliability and hard to electrify applications.

Unfortunately, Northwest Natural continues to promote the false promise to decarbonizing its gas grid through biomethane, hydrogen and synthetic methane. The fact is that these decarbonization pathways have been repeatedly proven to have higher cost and greater technical risk compared to the proven technologies for electrification, especially for space and water heating services in our buildings. Biomethane is temporary and a limited solution, hydrogen is dangerous and costly, and carbon neutral synthetic methane is a pipe dream. We should be discussing how we can gracefully age

out of our existing gas infrastructure in a way that maintains both the viability of the public utility and the affordability for its end-of-life customers. Instead, we are here to resist the Company's effort to sell its false promises. In our opinion, Northwest Natural is not acting in the public interest and does not deserve an increase in its profit margins. Also, it is -- it makes no sense to continue to subsidize any fossil fuel infrastructure, nor should we be incentivizing new buildings to connect to the gas system. We shouldn't be governed by past solutions. Low housing costs will mean nothing if we continue to ignore the climate crisis, especially with the escalating cost of gas, which saddles low income customers with high bills and questionable redundancy. I urge you, the Commission, not to allow any portion of this rate case. Thank you.

8. **Nataliya Piramova:** I'm here on behalf of Families for Climate. I'm testifying to request that the Commission reject Northwest Natural's efforts to use ratepayer dollars in support of their investments and false solutions, like renewable natural gas and green hydrogen and mitigate risks to ratepayers from continued expansion of the gas system. As a parent to two children, five-year-old Vietta (phonetic) and one year old Rosie, I feel like I owe it to them to attempt to somehow forestall the climate emergency that is barreling toward us, or in fact the one that's already here. We all know that fossil fuels are the major contributing factor to the devastation we see around us and which will only grow worse. Generations of adults are kicking the can down the road and hoping that someone at some point will do something to mitigate this, but we have the power to mitigate it to some degree today. We must start taking that action now. Northwest Natural's attempting to sell us on false solutions like biogas and hydrogen blending, these unproven resources are expensive, scarce and dangerous, and relying on them puts huge financial risks on Northwest Natural's customers if they fail to materialize. We need to stop expanding the gas system and start shrinking it immediately. I'm proud to live in a state that takes its climate goals seriously. It is clear that the only feasible and cost-efficient pathway for gas utilities like Northwest Natural to comply with Oregon's climate goals and decarbonize the gas system is through investments in electrification. Instead of allowing Northwest Natural to continue to prop up its business model with expensive and ineffective investments in out-of- state factory farms and other sources of gas, listen to the countless ratepayers and local governments calling for a managed transition to all electric homes and buildings. Thank you for giving me the opportunity to speak on behalf of myself and my children.
9. **Nora Lehmann:** Chair Decker and Commissioners, thank you for the opportunity to testify this evening. Like Nataliya, I am also a mom of two young children, Sally who is eight and Sydney who is six, and I'm also a member of Families for Climate. We are a grassroots nonprofit mobilizing parents, kids and families for climate justice and a livable future for all. We request that the Commission reject Northwest Natural's attempt to expand the system of methane pipelines at their customers' expense and at the expense of a livable climate for our children. A recent NOA report confirmed that in 2023 emissions of methane and carbon dioxide continue to surge to historic highs. Oregonian families are relying on decision-makers to set policy that ensures fossil fuel usage actually declines, not to prop up false solutions like biogas and hydrogen blending. In the context of our fragile and rapidly devolving climate and the fact that Oregon has yet to actually meet any of its greenhouse gas pollution reduction benchmarks, it is imperative to ensure that ratepayers aren't subsidizing the growth of fossil fuel infrastructure at the exact time when we need to be

ramping it down as rapidly as possible. Given this, we again urge the Commission to instruct Northwest Natural to discontinue its line extension allowance. As parents, grandparents and caretakers, we have an obligation to do everything we can to protect our children's health and safety. And we thank the PUC for your work and for considering our testimony. Thank you.

10. **Jay Clark:** My name is Jay Clark, and I am the Director of Government Relations at the Portland Metro Chamber. Thanks for allowing me to join you virtually. I'm here today on behalf of the Portland Metro Chamber. We are the greater Portland's Chamber of Commerce, and we represent the largest and most diverse network of businesses in the region with over 2,300 members, 80% of those are small businesses. I am here today to express the Chamber's strong support for Northwest Natural's line extension allowance portion of the current rate case. This is an example of exactly what we ask for from our public utilities today. With this proposal, Northwest Natural has identified a creative solution that allows consumers to access the energy they need and the equipment they value, and choose in a manner that protects resiliency, affordability, and is mindful of states' commitments to addressing climate change. It is vital that the region has two energy systems to support residents and provide certainty during extreme weather events like we've seen recently. This proposal ensures that we can continue to have this as our region continues to grow and as we shift to a lower carbon emission economy. It is critical, especially today, that we continue to have equitable access to energy choices and don't just make choices for those who can afford it. For these reasons, the Portland Metro Chamber urges the Public Utility Commission to approve the line extension allowance as proposed by Northwest Natural. We thank you for your time and consideration.
11. **Harvey Gail:** I'm the Executive Director of the Oregon Hearth, Patio and Barbecue Association speaking on behalf of the industry that installs and maintains gas appliances like fireplaces and heaters. Natural gas and the equipment it powers are highly valued by people not only for its efficiency and aesthetics and ease of use, but as has been mentioned earlier, for its role in providing resiliency in home energy use. And when the power goes out -- and it does, this happened this year, it happened three years ago, it was quite terrible -- people want to know they can stay warm and cook food. These are basic needs. People like these products and the affordability that natural gas provides. They depend on it. I concur with the homebuilders who have been on the call earlier, however, the line extension rule changes would reduce the allowance over time and change the market so that only wealthy neighborhoods would be able to afford having natural gas. So don't make energy resiliency a luxury item. That's what's going to probably happen under these rules, which is kind of the exact opposite of what this climate justice movement is about. So we would hope the Commission would be celebrating the creative solutions provided by Northwest Natural and honoring fuel choice, consumer preference and affordability. So, basically listen to the consumers and what they want. They want affordable resilient energy. And if not natural gas to provide this resiliency, what other technologies would the Public Utility Commission support to ensure the resiliency is available in these communities? So, again, we do support the line extension allowance proposal by Northwest Natural. Thank you very much.
12. **Jeremy Osterholm:** I'm the 2024 Board President for the Home Building Association of Greater Portland. I'm also the owner and President of OsterCraft Homes, Inc., where I am a

second-generation homebuilder in the metro area. I come before you today in support of the Northwest Natural gas line extension agreement proposal. The Home Building Association of Greater Portland, also known as the HBA, is dedicated to maximizing housing choice for all who reside in our region. Our members are industry professionals across the Portland metro region in six counties, 40 cities, and many more service and utility districts. As Justin mentioned earlier, our members have been heavily involved in working with Governor Kotek this last year in housing growth and housing affordability initiatives that she has successfully proposed. The recent trend of reducing the line extension agreement with the end goal of eliminating it plays against affordable housing. For years the line extension agreement has provided our members and communities around the region with a viable option to have multiple energy sources in our homes. With the LEA, builders will continue to provide natural gas to homes, but the consumer will ultimately pay more for this product, increasing the cost of housing. The current proposal presented by Northwest Natural provides an incentive to not only provide natural gas as an option, it incentivizes builders to use more energy efficient equipment in the homes they build. This is a win for housing affordability and for the environment. As a second-generation homebuilder, my family has been building homes in Oregon since 1974. I can proudly say in our 50 years of building, we have been installing natural gas to our homes. It has been considered an amenity and an asset for our home buyers. As a small company, we work daily to try to find a way to lower the cost of our homes so that we can compete in today's market. We are also always trying to anticipate what the next generation of consumer is going to want in their homes. In light of massive power outages, the last few winters, our consumers are making sure that we are able to provide natural gas as well as power so that they can have options when they are out of power during these winter events. They're also asking for energy efficient products. The new LEA proposal from Northwest Natural will make it easier for me to provide to my customers with energy efficient products and help keep my cost in check. I've read through Northwest Natural's proposal, and I'm not only in support of it, I am thankful that they have answered the call to serving our industry's growth while lowering emissions. I'd ask that you please take my testimony into account and approve this proposal. Thank you for your time.

13. **Paul Vogel:** Good evening. My name is Paul Vogel. I submitted written testimony, so I'd just like to provide a -- just a synopsis. I live and work in rural Oregon. Oregon has energy supply constraints, we have housing constraints, we have carbon reduction and climate goals, we have increasing clean fuel standards, and it's time for innovation and options that encourage housing, facilitate workforce supply and distribution and also encourage energy resilience and responsibility. So, we strongly encourage your approval of UG 490. Thank you.
14. **Mica McOmber:** I've been a homebuilder for 25 years in Lan County, Eugene area. Many aspects, I'm calling to comment on, one, on the proposed line extension allowance. So, I'm in support of Northwest Natural's proposed line extension allowance. I'd like to -- I'd like to reiterate, Mike Erdmann said it well early on in the -- in the testimony, and he said it probably better than I could ever say it and many other builders I concur with, and I am in agreement with the resiliency aspect or having the option to have -- have multiple fuel sources. The testimony that I've heard, obviously both sides of the aisle, the testimony opposing it tends to force -- tends to focus on the forced electrification, and I just don't quite understand their arguments. Homes -- homes that I'm currently building, some people are putting in two

electric car chargers -- two 50-amp electric car chargers. Oregon and Washington and California, 2035 it is proposed to ban internal combustion engines in new vehicles. Our electric grid is maxed out. I mean, we don't have the capacity in 11 years to power all of our cars. If we want -- if we want to actually make a difference, having dual fuel in a home and allowing our infrastructure, our electrical infrastructure, to handle these extra burdens of electric vehicles, we need to -- we need to keep that in mind when we're -- when we're making these decisions on natural gas in homes and making it affordable. Our -- our -- anyways, that's -- if you look at the electric grid of Oregon, 2020, 48% of electricity in Oregon was generated by burning natural gas and coal. You can look it up on Oregon.gov, 48% of electricity used in Oregon was generated by coal and natural gas. So, if you ban natural gas -- or if you try to limit natural gas use in the homes, you're just going to burn it somewhere else. Thank you for your time. I'm definitely in support of the proposed line extension allowance for Northwest Natural. Thank you.

15. **Preston Korsc:** Good evening, Chair Decker and members of the Commission. Preston Korsc here K-o-r-s-c And I am the Director of Government Affairs at the Home Building Association of Greater Portland. You have already heard from several of our members, each of them play a critical role in addressing our state's severe and worsening housing affordability crisis. We are here tonight to testify on behalf of those members and many more to show our strong support for the proposal generated by Northwest Natural that, as far as we know, would create the nation's first residential line extension allowance supporting both housing production objectives and energy grid decarbonization. Now, specifically approval of this proposal will accomplish several key objectives, the first of which is that it will continue to make it feasible for builders of all sizes to install important, and as you've heard, highly desirable and desired residential infrastructure that delivers natural gas now and can be used to transport important movement of clean energy sources into the future, including renewable natural gas and blended hydrogen products. It will also prevent further changes to our state's building and design code objectives, ensuring that builders and developers have a more predictable building environment in a regulatory landscape and capital market that is already volatile enough. And lastly, it will offer incentives for new technology that are still emerging from the market, which previous LEA models don't necessarily account for, including hybrid space heating solutions. And now it is important to note what this proposal and what LEAs are not. And a line extension allowance is not a subsidy, as some might suggest. Home builders will know that firsthand. Rather than -- and, you know, rather, it is -- it's a usage-based credit that utilities of all kinds, gas and electric, apply as an allowance for the high capital cost of bringing service to new homes. So, with that in mind, we encourage you to approve this proposal because it prioritizes both housing affordability while bending the market towards a cleaner and more efficient energy grid. So, the Home Building Association of Greater Portland is certain, and we believe that this plan will result in a more sustainable energy future, more reliable energy supply during peak events, and it will reduce the impact that overall energy consumption has on our environment. So with that, I thank you for hearing our testimony tonight.
16. **Jane Stackhouse:** I live in a 99-year-old duplex in Northeast Portland, and I'm here this evening to ask that you deny Northwest gas company's request for a rate increase to expand their gas distribution system and protect their shareholders from a changing market. The market is changing, our climate is changing, and we must take action now. I am also a

member of MCAT (Mobilizing Climate Action Together) and encourage you to review the written statement that Dr. Pat Delaquil summarized for us and was submitted on behalf of our organization. As a former Northwest gas customer, I am not concerned with my own pocketbook. I had the gas line to my home cut in 2020. My tenant and I are two of a growing number of gas free, all electric homes in Portland. You'll start seeing more and more signs "Electrify PDX." I ask you to deny the request because the last thing any of us needs is more methane, so-called renewable or not, circulating beneath our streets, polluting our air and endangering our neighborhoods. I am gas free, but I still live next to pipes that could rupture or leak and explode. I believe this danger increases as we near the predicted -- some objection -- earthquake. I was fortunate in that I could refinance at a low interest rate and complete the full Stackhouse electrification process at one time. I feel for low-income customers and renters who do not have that option. Customers should not have to pay for the shortsightedness of their energy provider, especially those customers who have limited options. Northwest gas has viable business options, other than the ones they propose of different types of gas, and we really need to encourage them to look into these other options. Please deny the rate increase. It may help them consider other, better, cleaner business models. Thank you very much for the time.

17. **Maria Torres:** (The following is translated from Spanish to English) Hello, my name is Maria Torres. I live in Washington County. I'm worried because this rate hike will impact members of my community and relative. I come from living situations in which \$20 makes the difference. I can understand when a change is being created to protect our planet. However, it can be done gradually and that this does not bleed poor families, like mine and that of my community. Many times, I could not find those resources that could make the difference that my family and my children could avoid those traumas of feeling unheard and abandoned. We have an unfair and inequitable system. So, I'm going to include some questions and answers that will help to understand why I stand in solidarity with my community at these moments. Was there a moment when I felt vulnerable or defrauded by the energy system? Yes. How did I feel? I felt impotent, for I knew the inflexibility. Regardless of how much I explained, many times they did not understand the changeability or how changeable the economic life can be for families in extreme poverty. How would I like that to change? I would like there to be more options for people who do not qualify for government programs, or because of their legal status, and that there are fewer requirements when there are children at home. A small thought on the reliability of the power company (energy). What happened? It destroyed me to see my children not be able to do their homework because we had no power (energy), to see them with cold because they could not use (turn on) the heater. I felt the lack of empathy on the part of the energy departments. Just on remembering, it breaks my heart for my children. Although they are now adults, I would not want any family to go through that situation. It must be improved, to take into consideration the basic needs of the elderly, children, and people with disabilities, and to have special programs that are easy to access without so much bureaucracy. It causes a domino effect when there are power cuts for low-income families or those with little or no access to assistance programs. It affects mental health as they lose these fundamentals without these necessities and causes frustrations. They are affected by the extra charges for being disconnected and then reconnected. When the few resources are lost, that causes trauma at the family level, et cetera. Is there some question that needs an answer? Yes. Where is the equity? How can I receive help if I do not meet the requirements, the majority of the time

are absurd. Where do I go if I do not have valid insurance or check stubs to prove my income? If I do not qualify for help when only \$20 dollars separate me from the low-income qualification table? And many more questions to enumerate. Thank you very much for listening to my testimony.

18. **Lisa Arkin:** My name is Lisa Arkin. Thank you, Chair Decker, and Commissioners for the opportunity to testify. First of all, I want to urge the Commissioners to reject all points in Northwest Natural's rate increase proposal. Until about three years ago, I was a Northwest Natural -- oh, excuse me, until about three months ago I was a Northwest Natural Gas customer. My gas furnace malfunctioned and stopped working suddenly in the middle of December. When the furnace servicing company came out to see what was wrong, they said the furnace had probably not worked very well for a long time. This furnace was likely leaking low levels of carbon monoxide and nitrogen dioxide in my home, and that could have accounted for my sudden onset of asthma about two weeks ago. So it was time for a new furnace, but I did not want to put in a new gas furnace. And I switched to an electric heat pump, and now the air quality in my home is clean and I have stopped coughing. Burning fossil fuels in our homes is not an amenity, as Northwest Natural would have us think, it is a system that introduces high levels of nitrogen dioxide, hydrocarbons and air toxics into our homes where we live, sleep and raise our families. So, I am here tonight to request that the Commission reject this proposal to raise rates and instead please build upon the direction you gave Northwest Natural's integrated resource plan to consider and incorporate electrification into the utilities decarbonization strategy. Northwest Natural's rate increase is meant to expand their system and adopt risky schemes that will not decarbonize their system as they claim. For example, Northwest Natural falsely claims that it can meet its decarbonization obligations by adding hydrogen blending into the natural gas system. These unproven resources are not only expensive, they are dangerous. I'm glad I'm no longer going to be a guinea pig for Northwest Natural to test their scheme for hydrogen blending into residential gas lines. My 60-decade old home, with its old pipes and fittings, would have been vulnerable to the damage that hydrogen can cause to pipe infrastructure. Hydrogen causes brittleness and degradation of older pipes, which could lead to disastrous leaks and explosions. Please do not allow Northwest Natural to saddle ratepayers with the cost of expanding their gas system for decades to come when we must reject more fossil fuels in our homes. The testimony from contractors about housing affordability is a red herring. My home is safer and my bill for heated water and my living space is cheaper than ever. I ask the Commissioners to recognize and reject the false solutions touted by Northwest Natural and instead move towards clean electrification and a new era of energy generation. And I thank you for your work, and for considering my testimony tonight.

19. **Brian Stewart:** I am co-founder of Electrify Now. We're a volunteer organization dedicated to promoting the benefits of electrification to homeowners and energy utility customers. Chair Decker and Commissioners Tawney and Perkins, thank you for the opportunity to testify. In order to meet climate targets and ensure we can continue to thrive here in Oregon, we need to stop expanding the gas system and begin to dismantle it, and this is because of the simple reason that there is no viable method to decarbonize the gas system. So, the more we build, the bigger the problems will be in the future. This means ending line extension allowances and subsidies for new gas connections, and carefully scrutinizing any gas infrastructure investments since these assets are certain to become stranded assets as

we shift our energy away from fossil fuels. Northwest Natural should be required to invest in electrification and thermal energy systems rather than continue to promote its business model, which has -- although it's worked for many years in the past, as we've heard from the developers, it's out of sync with the future needs of Oregonians, and even today's needs of Oregonians. Electrification has been widely researched and supported by energy policy analysts as the most cost effective decarbonization solution for nearly every sector of our economy, and certainly for housing and homes. Many home developers are already building on electric because this creates a high performing home with lower -- much lower operating expenses. The developers -- many of the developers testifying tonight have reinforced this fact that building homes all electric from the start is lower cost, so the idea that, you know, ending these line extension allowances somehow makes homes more expensive is just completely not true. If these homebuilders really want air polluting and carbon polluting gas appliances in the homes they build, they should not be subsidized to lower the cost for gas hookups and appliances. Where do those subsidies come from? They come from ratepayers. CUB and others have shown that these subsidies will not be recovered in the future. Please reject Northwest Natural's proposal to increase its ratepayer funded subsidies for new gas connections and instead direct it to end these subsidies which are not aligned with ratepayer financial interests and Oregon climate goals. Please build on the clear direction that you gave in Northwest Natural's integrated resources plan to appropriately consider and incorporate electrification into the utilities decarbonization strategy. Thank you.

20. **Bethan Cotton:** Good evening. Chair Decker and Commissioners Tawney and Perkins, thank you for the opportunity to comment. I am a resident of Eugene and, unfortunately, a Northwest Natural ratepayer. I ask that you deny Northwest Natural's proposal. As a ratepayer, I do not want my dollars to further subsidize new hookups that wed us to a fossil fuel proven toxic to our health and climate, creating more expense in the coming years when we inevitably electrify the grid. As an environmental lawyer and an auntie to two kiddos under three, I'm deeply concerned about Northwest Natural's concerted efforts to undermine necessary climate policies at the local, state and federal levels. I'm likewise concerned about the public health's impacts of gas. I'm working to electrify my 111-year-old home, an expensive process because of the sunk cost into gas appliances in my home when I purchased it, and the total lack of incentives to improve efficiency via weatherization or electrification available via Northwest Natural. Of note, despite contrary claims, the gas furnace in my home did not provide resiliency during the ice storm, and my new EWEB subsidized heat hump hot water heater is far more efficient than my gas hot water heater ever was. In August, during a required test, a Northwest Natural contractor discovered my meter was slowly leaking gas on the side of my home by my kitchen window. When asked when the company would come to fix the leak, he shrugged and said, "A week or six months." Six months passed, then I received a letter saying they would come to replace or repair the meter in March. March passed with no visit. It took multiple calls and e-mails, during one of which the Northwest Natural staffer told me my work had been pushed to 2025, and during all of which my concerns were dismissed. Then two missed appointments with no communication before the company fixed what turned out to be two leaks, eight months in. During the same week, a four-foot saw blade from a Northwest Natural contractor flew across a parking lot in Eugene, nearly hitting a man, and embedding into a small business's wall. This is the company asking you to allow it to charge me more to sell its dangerous product to new customers to increase its profits. Northwest Natural needs to

focus on ensuring its current infrastructure is safe for users and prioritize adopting actually proven techniques to meet long-standing climate requirements. Please order Northwest Natural to end ratepayer subsidies for new hookups entirely and build on the clear direction you gave in Northwest Natural's IRP to ensure its decarbonization strategy incorporates electrification. Thank you.

21. **Deanna Palm:** I'm President of the Washington County Chamber of Commerce. The Washington County Chamber strongly supports Northwest Natural's line extension allowance, which we believe is essential for fostering economic development and enhancing community well-being in our region, while focusing on decarbonizing the energy system and protecting resiliency for residents. Washington County is a vibrant community with growing residential and business needs. Northwest Natural's innovative proposal to enable the building community to affordably deliver housing with resilient energy systems will significantly benefit our local businesses by providing residents with reliable, cost effective energy options that are crucial for daily operations and long-term planning. This proposal is not merely an enhancement of resiliency, it is an investment in the economic foundation of our county. Moreover, this project aligns with our commitment to sustainability and responsible resource management. Natural gas plays a pivotal role in our transitional energy strategies, helping us balance growth with environmental stewardship while ensuring that the energy that residents depend on is available, even during extreme weather. By supporting this proposal, we are endorsing a vision that promotes growth, reliability and sustainability -- a vision that is integral to the future of Washington County. Therefore, I urge the Commission to consider the substantial positive impacts this project will have on our community and to approve Northwest Natural's line extension allowance. Thank you so much for your attention and consideration.
22. **Ann Turner:** Chair Decker and Commissioners Tawney and Perkins and Judge Spruce, thank you for the opportunity to speak. I'm a physician retired from a career in community -- in a community health center caring for farm workers, workers that are among the most vulnerable to the devastating impacts of heat. I now volunteer with Oregon Physicians for Social Responsibilities Healthy Climate Action Team. As such, I urge you to deny Northwest Natural's request to increase its rates to ratepayers. Following the same playbook as the tobacco industry, the fossil fuel industry, that is Northwest Natural, continues to focus on three main tactics: denial, delay and delude. They have certainly been successful in deluding many in the homebuilder's industry. Asking ratepayers to pay for subsidies for gas connections in new buildings locks in burning methane for the next 10 to 20 years. The climate clock gives us less than seven years. We cannot afford new fossil fuel infrastructure of any kind. Methane warms our climate and pollutes our air, both indoors and out. In terms of delusions, Portland -- I mean, the Public Utility Commission, sorry, has already rejected Northwest Natural's IRP to plan to reduce emissions by using renewable gas, RNG, and hydrogen; both are false solutions. With RNG mostly coming from factory farms and landfills, industries we don't want to promote, and hydrogen ignites more easily and is more explosive than methane. It places lives at risk. Both are enormously expensive, and neither are a climate solution. Requiring warning labels on and banning advertising of tobacco products resulted in a drop of tobacco use from 40% in the 1960s to about 12% today. It's time to decrease the 40% of Oregon households that heat their homes with gas to 12% or less and support them in transitioning to more efficient electric heat pumps, 300% more

efficient than gas furnaces, and also providing air conditioning. The Public Utility Commission can move us in the right direction by denying Northwest Natural's rate increase and ending ratepayer subsidies -- ratepayer funded subsidies for new gas connections and incorporate electrification rather than RNG and hydrogen into its strategy to reduce greenhouse gas emissions to meet Oregon's climate goals and to support affordability for environmental justice communities by not increasing rates. Thank you so much for all you're doing and the opportunity to comment this evening.

23. **Linda Kelly:** Chair Decker, Commissioner Tawney, thank you for the opportunity to testify today. My name is Linda Kelley, and I currently volunteer with 350 Eugene, whose focus is on climate problems and solutions. I have formerly worked with Bay Area Air Quality Management District in their source testing lab. I'm testifying today to request the Commission reject the utility's efforts to use ratepayer dollars in support of their investments in projects like renewable natural gas and green hydrogen. While there can be some very limited use for these operations, they must not include any expansion of the gas systems. Fossil fuel investments are not in the public interest, and the financial risk to ratepayers is quickly becoming well recognized. The head of the EU environmental agency, the European Central Bank and our own US Treasury Secretary have all warned of growing potential of systemic financial shock due to unjustified valuations of fossil fuel stock and the cost of disasters due to a rapidly changing climate. The fossil fuel industry, like all businesses, must be able to adapt or perish in the American economy. There are projects currently in development and in operation repurposing gas lines to carry geothermal energy in neighborhoods and acting as conduit for some larger long-distance electrical lines with the added benefits of protection from forest fires are options. Our building resilience bill package passed in 2023 creates mandates and incentives for clean sourced energy efficiency. Meta and Google, who combine ambitious climate commitments and ravenous demand for electricity to run their data centers are beginning to favor geothermal energy for safe, base load, abundant electricity. The climate mandate and financial opportunities do exist. Please ensure that you create rules that will further ensure that the fossil fuel industry will leave behind a culture of denial and move forward and find a place in a new clean energy economy. Please make sure that the burden of this change does not fall on already financially challenged Oregonians. A few other things I need to say after listening to the builders. One is, I was staying at a friend's house -- I'm all electric and I have a heat pump at this point -- I was staying at a friend's house when they had a power outage. They had a gas furnace. The gas furnace did not work because most newer gas furnaces have electrical starters. One piece. The other piece I just have to say is, I have a woodstove, and I have to say, a small wood stove is an excellent solution for any emergencies. We use it rarely, a number of times a year in the winter, or in an emergency you can cook on it, you can make hot water, you can heat your home. It is another solution. (Ms. Kelly is advised by ALJ Spruce she has exceeded the three-minute time limit.) I think I'm fine. The only other thing I'd like to say is when the homebuilders talk about options, I want people to remember that our children need options for a clean healthy future. So, thank you so much for taking my testimony.
24. **Chloe Wilson:** Hello, Chair Decker and Commissioners Tawney and Perkins. My name is Chloe Wilson, and I'm currently a representative of the Tigard Youth Advisory Council, and I have worked formerly with the Oregon Energy Trust in the building of -- in the planning of

buildings on my school campus. As a resident of Tigard, I know that many people are barely getting by with the way that expenses are at this point in time. Electrification remains a primary solution for consumers in the most feasible way to meet the state's decarbonization goal by 2035. Northwest Natural's higher fixed charge on new single family and multifamily occupants will burden new homeowners with a charge they can do nothing about. The company proposes to encourage developers to install gas appliances through its line extension subsidy while penalizing new homeowners with a high fixed charge based on the developer's subsidized decision to install gas appliances that homeowners did not ask for. Meanwhile, existing ratepayers are burdened with the cost of the expanded gas system for decades to come. At this point, it is unsustainable to impose green hydrogen upon consumers because of its high energy consumption, loss of energy value, and low cost effectiveness. I'm concerned about the unrealistic and misleading claims gas companies have been making about the availability, costs, and benefits of these renewable energies. I really urge that the Commission take account of the -- sorry -- I really urge that the Commission will be skeptical of Northwest Natural's plan to promote renewable natural gas in the future. There are other options that we can consider that will be a lot more cost effective and more valuable in the future. Thank you.

25. **Kailani Rue:** Good evening, Chair Decker, Judge Spruce and Commissioners Tawney and Perkins. I greatly appreciate this opportunity to testify today on the matter of the Northwest Natural's flawed position. I am a member and representative of the Tigard Youth Advisory Council as well, and we are highly concerned about the potential passing of this (inaudible). Northwest Natural proposes to increase its ratepayer funded subsidies for multiple new gas connections. These are outdated, expensive and climate damaging systems that must be rejected. Northwest Natural has asked to increase its return on equity, meaning more money will be -- sorry, I lost my train of thought there -- more money will be going from the ratepayers' pockets to the investors, partially because it recognizes that the business model is out of sync with the state climate policy, and is, therefore, highly risky. Northwest Natural has not proposed any steps to manage that risk by aligning its business with state policy. If Northwest Natural is going to charge more to customers strictly based off of that risk, it must be required to invest in electrification, which is the only plausible long-term decarbonization strategy. This proposal is highly risky and will only damage our climate. Because of this, I ask that you strongly reject this deeply flawed proposal. Thank you.

26. **Craig Schuck:** I'm a homebuilder in the Portland Metropolitan area and have been for -- since 1989. I don't want to repeat anything that any of the other homebuilders said, so there's a couple things I'd like you to think about, and one of them is, is that homebuilders aren't here to support Northwest Natural Gas -- and I do support the proposed line extension allowance -- we're not here to support it because of some kind of collusion or relationship with Northwest Natural Gas, we're here to support it because it works. It's cost effective, and it's what the buyers want. Over the years I've looked at numbers of different projects, and we have evaluated offering consumers electric ranges, electric fireplaces, and it's not -- some people do want it, that's true, but the bulk of people do not want it. They want to cook on natural gas. And we also use it because it's more cost effective. If electrification and electric appliances were as cost effective as what you're hearing tonight, builders would be using them en masse. We use them because we have a housing crisis, we're under a huge number of restrictions already, and so to eliminate one of the choices that we have to

provide to customers would not be a good idea. And I'm not saying -- and I know some of the people here speaking tonight want it completely eliminated, and that just doesn't make sense. One of the men who was supporting it said we need to gracefully age out, and that might be the case over a long period of time, but the reason that we enjoy some of the low energy prices that we enjoy today is because of natural gas's significant presence in our market along with electric, and people have a choice. And that's -- if one of those options is gone, the other one is surely to increase. And so, I guess that's all I have to say for you tonight. Thank you very much for listening to this and have a good evening.

27. **Silvia Tanner:** For the record, I am Silvia Tanner, and I'm a Senior Energy Policy and Legal Analyst with Multnomah County's Office of Sustainability. So now to my comments. Chair Decker, Commissioners Perkins and Tawney, Northwest Natural requests a residential rate increase of 17.8% on top of over 30% in Northwest Natural rate increases since Octo -- sorry, since late 2022. And this is in addition to any increases that we might also see related to any adjustment (indiscernible) for all of those known rate case related increases that we might see during the year. And so that -- in light of the cumulative impact of those increases, current and future, I ask that you use your discretion to reduce Northwest Natural's requested increase as much as possible, while conserving community serving aspects of the proposal. Since this is a rate case and much could be addressed through settlement (indiscernible) my comments are also directed to Staff and to other parties that might be listening today. As you enter into settlement conversations for Staff and parties, or as you review settlement agreements for the Commissioners, I ask that you consider impacts on customers, emphasizing and factoring impacts on those most burdened and vulnerable to this connection. I also ask that you consider our environment and how issues impact environmental justice communities. Finally, I ask that you center energy justice and energy justice voices from interveners, (indiscernible) interveners, and also from PUC Staff as you go through this process. Now to my specific recommendations, first I want to encourage you to reject the Company's proposed return on equity. It is a significantly higher rate of return on equity than the 9.5% stipulated in the (indiscernible) rate case that you approved less than a year ago. For that reason and given the high pressure that our community is feeling, this is not the time for Northwest Natural's requested increase in their return on equity. Second, I ask that you reject the Company's proposal to first expand incentives for adding gas infrastructure while also adopting a steep increase in the fixed charge for new connections. As Oregon and the region are pushing to build new housing, Northwest Natural's proposals will first (indiscernible) infrastructure growth and increase emissions or increase emission reduction requirements for years to come. Meanwhile, the overwhelming majority of people who will live in the house and will not have a say on whether they heat with gas or whether they heat with electricity, while facing also the steep increase in the fixed charge that the utility is proposing in its rate case. That fixed -- increased fixed charge proposal also lacks an energy justice framework lens because it does not, for example, consider energy burden. The proposal applies across the board regardless of the customer income. And while the Company does point to its two-dollar discount for multifamily owners, again this is a -- this (indiscernible) applies across the board, and that's not been tailored or show an effort to tailor its proposal to consider the needs of energy justice community and energy burdened communities. And finally, we support an important aspect of the Company's plans, which is its proposed expansion to its low-income customer discount plan. However, I will most emphasize that we're disappointed that the Company decided to

include this in the rate case. This is a decision that raises procedural equity concerns because the rate case has limited space for (indiscernible) participation, and a lot of the discussion can happen among entities with the capacity and (indiscernible) to intervene compared to the more (indiscernible) process that the Company could have used like the process that led to the establishment of the discount programs in the first place. I thank you for the opportunity to comment.

28. **Wendy Woods:** Good evening, Chair Decker and Commissioners Tawney and Perkins, my name is Wendy Woods. I have a PhD in Aquatic Ecology. I'm retired now, and I'm currently focusing on solutions to global warming. I oppose increasing costs to ratepayers for Northwest Natural's false solutions such as bio- gas, hydrogen blending and renewable gas. Why? Natural gas is primarily methane, which is also including a lot of toxins that increase the rates of asthma in children and correlate with increased rates of cancer, lung, and heart disease. Use of gas to cook and to heat homes is bad for public health. So, it isn't safe for public health. Second reason. Our area is known to be subject to sizeable earthquakes, and these are likely to rupture pipelines, causing explosions and additional damage beyond the earthquake. So, gas is a safety issue. Additionally, worldwide, scientists agree that natural gas, which is a potent greenhouse gas, is the most important lever that we have to reduce global warming by preventing leaks in the national distribution system. So, we need to be shutting down methane, not expanding it. And Northwest Natural seems to ignore all of these facts and just proceed as if nothing has changed, as if there's no new information. Also, I wanted to tell you, I'm a homeowner who converted a gas-powered home to all electric, and in doing so -- and I also added energy efficiency through quite a bit of insulation and good windows, and I can testify to that reducing my energy use by half with significant savings on utilities, while improving the health and safety in my home. And part of that savings comes from the heat pump that I'm using to heat the home -- a small heat pump does the whole home -- and also from the heat pump water heater which is far more efficient than any gas water heater you can get. So, what's needed to address the global warming caused by methane and burning other fossil fuels is a managed transition to electrification of homes and buildings, and this should be required of Northwest Natural if any rate increase is granted. Thank you for your consideration.

29. **Maria Hernandez Segoviano:** Thank you Chair Decker and Commissioners Tawney and Perkins and the PUC. For the record, my name is Maria Hernandez Segoviano. I'm an environmental justice advocate, and today I'm here to please urge you to reject Northwest Natural rate proposal. More importantly, I am urging you to reject all components of Northwest Natural's proposal. By this time, we all should know that in order to meet state climate targets, we need to reduce and eventually eliminate the use of natural gas, which is composed of methane, a potent greenhouse gas that's contributing to global warming. We also know that farmland communities are the ones who experience the worst and first impact of climate change. We don't have to look too far as we saw the impacts this past winter storm had on our communities. As a mom of a -- as you hear him in the background -- as a mom of a brilliant almost three-year-old who can identify when things smell bad, I almost recently changed -- I most recently changed from a gas stove to an electric one, and my little one now doesn't say it smells bad. And, no, it was not my cooking that smelled bad. Turns out I had a small leak of gas coming through my stove. While I am still a Northwest Natural customer, it is my role to fight for a better, healthier world where communities are

fairly treated -- where we are fairly treated and where my son can feel safe at his own home. I am troubled to see Northwest Natural and ultimately all utilities constantly putting profits over people in which this attempt to expand subsidies for growing its system and its profits at the expense of customers who cannot afford it. And Northwest Natural is only -- Northwest Natural is only bringing us backwards. We need more stability and resiliency. It is -- if this increase is approved, an average Northwest Natural home could pay an amount of \$1,122.82 in 2025 at more than 50% since 2020, according to some statistics. Northwest Natural's case for increasing ratepayer funded subsidies from many new gas connections is, again, a step backwards to our goals of a healthy, thriving, resilient community. To this date, I question the value of service I get when I look on my Northwest Natural utility bill. In the past few years, all I have seen is more costly gas bills, more stories of people in my community who have to make the hard decision between staying warm during cold winters and having food at their table for their family and so much more. It is important that the PUC looks at the performance of this utility and ties the rates of how utilities deliver services, but most importantly take a look at our future and the future of our kids and children in moving forward, and also consider the fact that farmland environmental justice communities are yet again being the ones overburdened by those utilities proposing new gas connections to help meet goals to cut climate warming emissions and boost resiliency, which it really, in return, means they are requesting higher rates. I concur with many folks who have to share their -- who have already shared their testimony, and I agree that there needs to be a stop on this proposal, and we have to look for ways to make the system stable and resilient. What Northwest Natural is proposing is far too outdated, it is costing communities way too much money, it is causing -- it is causing unhealthy choices and is ultimately continuing to damage our climate. But most importantly, again, as a mom, I want to make sure that my kid is able to live in a world where we're not actually going backwards, but we instead are continuing to move forward. Thank you so much.

30. **Anne Pernick:** Thank you, Chair Decker, Commissioner Tawney, Commissioner Perkins, Judge Spruce and Staff, for the opportunity to testify today. My name is Anne Pernick. And I am with SAFE Cities at Stand Earth I am testifying today to request that the Commission reject the utility's efforts to increase its ratepayer funded subsidies for many new gas connections, and instead order it to end these outdated, expensive and climate damaging subsidies. Please build on the clear direction that you gave in Northwest Natural's integrated resource plan to appropriately consider and incorporate electrification into the utility's decarbonization strategy. In terms of customers' bills, climate, health and safety, it is time to move our buildings off fossil fuels. Like many people giving testimony tonight, I'm an advocate and a parent. Gas leaks at the school itself or in the neighborhood have been an issue at both elementary and middle school for my child. Like several people, I used to have a gas furnace, it did not provide heat during power outages. And we don't need methane gas in order to have backup power for our homes. Please reject the utility's efforts to increase its ratepayer subsidies -- or ratepayer funded subsidies. Thank you very much.
31. **Bill Krasnogorov:** Good evening. My name is Bill Krasnogorov. I want to thank Chair Decker and Commissioner Tawney and Commissioner Perkins for taking your time to hear and be able to understand the community when it comes to energy usage. I'm a builder and developer. I'm on the Board of Directors at the Home Building Association, really a professional in the home building industry. I focus on both custom building and entry level

homes that were made possible by the newly adopted middle housing code, so I see the wide spectrum of housing that is much needed in our area. Today I want to really speak and focus on the Northwest Natural line extension allowance. I'm a huge advocate for the freedom to choose the energy source that's available to us. Those that want to choose to be all electric are always free to do so. Why limit the majority of our customers' options to select a dual fuel? Natural gas is the quickest and most efficient way to heat water, homes, and cooking energy source. The flame in the home has been an important and the most efficient way to produce heat. There is a lot of noise when it comes to emissions and clean energy. Many forget that PGE is the largest consumer of natural gas. People that believe going all electric is a more environmentally friendly option are simply forgetting how most of the electric energy is produced. Many of those that understand energy usage and its availability tend to be professionals in the development and building industry. It is no secret that the hybrid energy home is the most efficient home. A hundred percent of our consumers choose to go dual fuel or energy source when it is available. I'd like to remind us all that natural disasters are the largest cause of carbon emissions, not the responsible use of natural energy provided by Northwest Natural. When it comes to reliability and resiliency, as a parent, I want to make sure that in times of extreme weather I am able to be equipped with the most reliable energy source for the basic necessities of heating and cooling. I am very thankful to Northwest Natural for taking care of our region's energy needs and providing the reliability necessary for our survival and comfort. Unfortunately, those that are most vulnerable are the ones who tend to be the most affected during outages because they simply could not afford a more reliable energy source. That said, I would like to voice my support for the line extension allowance proposed by Northwest Natural. Thank you.

32. **Alan Journet:** Chair Decker and members of the Public Utilities Commission, thank you for the opportunity to testify. Following a career of teaching biology at Southeast Missouri State University, I have relocated to Southern Oregon and co-founded and now serve as co-facilitator of Southern Oregon Climate Action Now. I testify today on behalf of SOCAN, an organization of over 2,000 rural Southern Oregonians who are concerned about the climate crisis. Although we do not live in the franchise area of Northwest Natural, we suspect that a successful application from this utility would lead to an application from our gas utility, Avista. I offer a brief summary of written testimony submitted yesterday. SOCAN activists have been engaged with the statewide climate activist coalition since our establishment a dozen years ago. Throughout that period, we have been repeatedly disappointed by the actions of Oregon's gas utilities in campaigning time and again to defeat legislative efforts to establish a trajectory of reducing greenhouse gas emissions that would put our state in the mainstream of jurisdictions addressing the climate crisis. More recently, this disappointment has been reinforced by their effort to undermine the DEQ Climate Protection Program, despite their serving on rulemaking advisory committee that helped develop it. We are left to conclude that these utilities are not acting in good faith when it comes to doing their share to lower statewide greenhouse gas emissions. This disappointment has been extended by the Northwest Natural rate hike request that seeks a hike to generate increased profits, expand rather than contract their gas distribution network, and support a marketing campaign that has both historically and recently been a perfect example of marketing through misinformation and disinformation about RNG and hydrogen, for example. And we've heard exactly the same misinformation and disinformation from several of the builders testifying today. We urge the PUC to reject this egregious request to require Northwest Natural

customers to foot the bill for their business commitment to undermining the health of users of its product and compromising the ongoing viability of life on the planet as we know it. If we collectively are to turn the tide on the climate crisis, we have to stand up to the fossil fuel interests that consistently and unapologetically make matters worse. Please stand up for health and life. Thank you very much.

33. **Mark Gamba:** Good evening, Chair Decker, Commissioners Tawney and Perkins. Thank you for the opportunity to testify today. My name is Mark Gamba, and I have served as a City of Milwaukie Planning Commissioner, city councilor, and two terms as the mayor. I currently serve that district as its state representative. Many cities in this state, including Milwaukie, have done the important work of creating climate action plans in order to help stop the most devastating crisis humanity has ever faced. In most of those plans, reducing methane emissions is one of the many critical steps. However, cities fail to achieve any movement in that direction due to state preemptions and the litigious nature of the industry. One of the first steps that many cities consider is to cause all new development to be fully electric. A major hurdle to those efforts is the fact that current Northwest Natural ratepayers unknowingly subsidize line extensions, making it cheaper and more attractive to developers, which allows them to maximize their profits since they will charge what the market will bear, regardless of the costs. A prudent step in considering any rate increases requested by Northwest Natural would be to disallow this behavior, thereby reducing cost to ratepayers and assisting cities in their efforts to decarbonize their energy mix. It also increases safety by reducing the opportunity for catastrophic explosions and subjects' fewer people to the well-studied detrimental health effects due to dangerous indoor air quality by cooking with a gas stove creates. I currently serve on the Climate Energy and Environment Committee, as well as serving as the vice-chair of Housing and Homelessness. From both perspectives of safe and affordable housing and rapid reduction of raw methane in the atmosphere, it is very clear that it's time to stop subsidizing this industry. Please build on the clear direction that you gave Northwest Natural's integrated resource plan to appropriately consider incorporating -- to incorporating electrification into the utility's decarbonization strategy. Northwest Natural has been green washing its industry by talking about green hydrogen and renewable natural gas for quite some time now. I strongly support collecting and utilizing all methane produced by landfills, sewage treatment plants, dairies, et cetera. I also strongly believe that investments should be made in green hydrogen, as both an energy storage choice and to replace methane in industrial and transportation forms that are difficult to electrify. These fuels will have a role in decarbonizing hard to electrify sectors but should not be used in homes and buildings that can be easily converted to run on renewable electricity. I do not believe ratepayers should be on the hook for costly investments and fuels like biomethane and green hydrogen. That's what investors are for, to supply necessary capital to shift business model in order to preserve viability of said business, at least that's what it should -- that's -- that's what their purpose should be. The bottom line is that given that raw methane is 86 times more potent than CO2 in warming our climate, we should be moving to reduce fossil methane use to near zero in our lifetimes. Continuing to allow an industry from the past to damage our futures while impoverishing our residents is clearly not in our state's best interest. Thank you for your time and consideration.

34. **Jeff Kugel:** My name's Jeff Kugel. I work as a Director of Power Supply for PNGC Power, which is one of Oregon's only generation insurance mission cooperatives, so we're like REI

for electricity, I like to say. And we represent roughly four percent of the Oregon retail load in the state. And we kind of have a different flavor when we look at the – you know -- we're going to comment on the line load -- or the line extension allowance, sorry, and we're in favor of that. We have considerable resource adequacy problems. Obviously, the variable (indiscernible) resources that are carbon free are exactly that, variable. We -- many folks have referenced the winter storm in January, and we were importing into this region over 5,000 megawatts over that five-day period every hour of every day. So – so we are already very concerned with being able to meet the load that we already have hooked up on the system. And so, I just want to point that out that, you know, we need to work together on this thing, and we're not at a point, at least from the electrical standpoint, that we're able to – to load switch all this gas. And so, you know, one of the commenters was saying we have to do it quickly, but, you know, we have to do it reliably and working together with the gas system, and the line extension allowance really -- really allows the gas and electric sectors to take a comprehensive look at how to meet the energy needs in the most cost effective way. And that may not -- that -- you know, that may mean we need gas in times of our greatest need. And -- and one of the -- one of the line extension allowances, it allows for high efficiency heat pumps, which is -- is a great thing. But, yeah, we just want to encourage to look at facts and look at what we have going on right now and what we're capable of doing. And we need to work together. And the line extension allowance really is just maybe too early to cut off, and we would support keeping it there. And that's all I have. Thank you for listening. Appreciate it.

35. **Eli Spevak:** Judge Spruce, Chair Decker and Commissioners of the PUC, my name's Eli Spevak. I've been a homebuilder since 2006, and I recommend that the Commission reject the line extension allowance proposed by Northwest Natural. Through my company, Orange Splat, LLC, I've built nearly 100 homes. In early homes, I put gas tankless water heaters in pretty commonly for in-floor radiant heat, but for the last 40 plus homes I've built, they've been all electric. And the 15 I'm building right now are all electric as well. I build homes primarily, but not exclusively, for moderate income first time home buyers. What my customers want are low utility bills, they want cooling, they want healthy homes for their families, and those that care about the climate want to live their values. Electric homes provide exactly what they're looking for. I'm friends with some folks I've put gas systems in years ago, and I kind of feel bad for them because as many of you know, I mean, the price of gas went up 42% in 18 months, and although electric bills are climbing as well, they're not going up as fast as gas. And I feel that if you have a gas home, you're kind of trapped in a cycle where stranded costs can end up being your costs. Picking interior finishes for homes last year, I just looked up what my peers are building in the local market, I toured five in-field developments by other people, one of them had gas, all the others were all electric. More recently, I did that about a month ago, picked four different projects by peer builders, every one of them was all electric. The market is already going there for entry level homes. So, as you know, efficient gas water heaters and furnaces require electricity to run, but efficient only gets you to 90% -- maybe up closer to -- in the 90s, somewhere in there for gas appliances. With heat pumps, electric ducted or mini-split or heat pump water heaters, you're at 300%. You can get there only with electricity. So in theory, gas could be used for heat pumps, but as you know, that's not been a promise that's proved out. And even if it did, it would be more expensive. In terms of generating electricity, sure maybe half of the electricity generated from nonrenewable sources, but that's changing quickly because the cheapest new power

supplies are wind and solar. For the climate, consumer electric bills and people's health, and to avoid burdening gas customers with stranded costs, we should be trimming our gas system, not providing financial tools to expand it. And I will say that I'm not -- I'm associated with the Portland HBA, but I will volunteer that if you're in the Portland area this weekend, come check out HBA's Homes of Tomorrow Today tour to check out some just built electric homes in person. If you stop by say hi.

36. **David Heslam:** Chair Decker and Commissioners Perkins and Tawney, my name is David Heslam. My regular day job, I am the Executive Director of Earth Advantage, a 501(c)(3) nonprofit based in Oregon. I am a past builder here in Oregon. I'm also a policy committee member at the Zero Coalition organization of nonprofits, local governments, construction related businesses working on decarbonizing the built environment here in Oregon. And two years ago I spent eight or nine months, was it, on the Resilient Buildings Task Force for Oregon, which was a legislatively led task force that looked at how we could have policies over the coming years in Oregon to both make our buildings more resilient, but also more efficient and decarbonize to not only address carbon mitigation, but also how we were going to adapt to things like the storms that people have been talking about that we suffered through in January. And that task force -- I just want to speak to that because to me that's been the most in-depth conversation that I've known of that is addressing all these issues, and we analyze many, many different types of policies that could be brought forward. Members of the gas industry were there, homebuilders were there, and during that entire conversation, there was a lot of discussion about the future of gas and that -- whether or not the gas system could actually be decarbonized over the long-haul and, therefore, be something that we could depend on after the transition period that people have been mentioning. The math never really seemed to pencil out that there was enough resource, actually, to reclaim in Oregon to meet the future need that was being proposed. Therefore, I will just say, you know, what I came away with after all those discussions was we can really only decarbonize one of our grids, and that would be the electric grid, and that whatever amount of decarbonized gas is still available once that is fully decarbonized, that's probably just going to be used by industry. It's going to be way too expensive from the economic analysis we saw to actually be a part of the system that's feeding buildings. So, I'm here to recommend that both the line extension allowance modification that Northwest Natural's asking for be rejected, and, you know, also, you know, the higher rate of return, as was mentioned by earlier testimony, does seem out of place at the moment, given that we are trying to reduce the cost of housing and the expenses related to housing today. So, the only other thing in my maybe 10 seconds I have left to point out is that change is hard, and we're in a state where there's a lot of change. Not the state of Oregon, the state of the world, like, where there is a lot of change that's going on. I do not underestimate that the change is hard for everybody involved, including for folks that are learning how to build buildings differently. We've heard from folks who want to stay, we've heard from folks who say that homeowners still want to keep having the same things they've always had, but it's hard for everybody involved and I do think everybody has to lean into it because if we're going to get one of these systems decarbonized, it's going to take everybody putting everything they have into it. Thank you very much for your time. I appreciate it.

37. **Josh Salinger:** So, my name is Josh Salinger, and I'm a builder in Portland, Oregon, Birdsmouth Design-Build is our company, been in business about 15 years. And Chair

Decker, Judge Spruce, Commissioners Tawney, and Perkins, I'd just like to take this -- I'm testifying today to request that the Commission request the utility's efforts to use ratepayer dollars in support of their investments and false solutions like renewable natural gas and green hydrogen and mitigate the risks to ratepayers from continued expansion of the gas system. I, you know, heard a bunch of things about resiliency, and I kinda wanted to speak to that, just listening to some of the comments. The last house we built had solar and storage on it, and the January ice storm knocked out power, and those clients didn't even notice that their power went out. In fact, their -- they stayed completely comfortable and had access to all of their energy. And we did that through electrification of the home and reducing the energy consumption of the home through really good enclosure. And we've been doing this for 15 years. We haven't installed gas in our homes for 15 years, our company has been very successful for it. We can provide very healthy indoor air quality for our clients. And I argue that once you make the change to building like this, it just becomes building, and it becomes the norm, and, you know, it's really not any more expensive. In fact, we enjoy not having to pay to have the gas line brought into our projects. So back to the resiliency thing, you know, it worked great in the ice storm, but I'd like to point out that there's also summer. And we had a heat dome a few years back, it was 116 degrees here in Portland, Oregon, and these -- natural gas can't keep you cool, whereas heat pumps can. And so, electrification is actually much more resilient than natural gas because we're missing half the equation. And if you have an elderly parent or an older person or someone that is on the front line, communities that can't handle that heat in their homes, this is a way to make these buildings survivable. So, with the introduction of renewables and storage, we can actually reduce the use -- the electrical usage through energy conservation building enclosures, and we can make homes healthier and much more resilient. So anyways, wanted to point that out and thank you for the opportunity to comment.

38. **Samatha Hernandez:** Yes. Good afternoon, Commission -- or, I guess, good night. My name is Samantha Hernandez, and I am the Healthy Climate Program Director at Oregon Physicians for Social Responsibility. We are an organization of over 2,000 health professionals and public health advocates. We're working to address the gravest threats to health and survival, and we are here today urging the Commission to reject Northwest Natural's general rate revision. Last month was Earth's warmest March on record, making it the 10th month in a row to set a global heat record. We are living in unprecedented times of financial hardship due to record high inflation and the economic consequences of the ongoing Covid-19 pandemic. Approving this rate case increase would impact energy burdened households the most. Higher rates mean families will have less money to purchase goods required for health such as adequate shelter, healthy food and medical care. Now is not the time to be expanding gas subsidies that will hurt people's pockets and their health. Northwest Natural is proposing to increase the subsidy to up to \$3,600 per hookup, which could cost customers tens of millions per year, and this is not affordable at all. Moreover, gas appliances generate a number of harmful air pollutants including nitrogen dioxide, carbon monoxide and formaldehyde both indoors and outdoors that have been linked to a variety of serious health harms. Burning hydrogen gas in buildings, a false solution Northwest Natural is relying on, also creates air pollution that contributes to asthma, heart disease and premature deaths. Natural gas is not a reliable source of energy, as others have claimed. In extreme cold, gas pipelines and powerplants are failing to deliver when they're most needed. There's a common myth that gas appliances are better because

they keep working when the lights go out. While natural gas can still flow into a home during a blackout, many appliances still require power to operate. And moreover, several studies have shown that all electric new homes save costs both up-front and over time. Mixed fuel homes, for example, in both Seattle and Spokane cost more than -- \$7,200 more to build than all electric homes. Oregon PSR strongly urges the Commission to reject Northwest Natural's rate increase. And thank you so much for the opportunity to testify.

39. **Tom Walter:** All right. Well, thank you very much, Commissioners. I'm a builder out of Eugene. I've been a part of developing in the Eugene area for over 30 years. First, I'd like to say that of all the utilities that I deal with when we try to develop, Northwest Natural has been an excellent partner for how we do things. It's really challenging in our community to work with both the local agencies and the state agencies and the other utility companies, but Northwest Natural is simply the easiest to work with of any -- of any -- of people we have to collaborate when we put together subdivisions. So, it's just interesting, they make it -- they make it -- they make it easy. They've been a good partner. And I'm a believer in clean gas. Of all the fossil fuels that burn, natural gas burns far cleaner than anything. And we have a -- we have a problem providing enough energy for our requirements, and our population is growing rapidly in the Northwest, and we just don't have the ability to get off of using natural gas to create electricity. So, you can either create energy in the home like we do with -- we heat water, or we heat air or have a gas fireplace that does run when the power goes out, gas cooking does work when the power goes out. The energy that we need to run the Northwest is tied to natural gas. If we electrify our homes, we're going to be burning gas in the powerplants to generate electricity so we can have electrified homes. There's just no way around that. So, I like to give my customers the option for what to put in. We're currently building in an area where we have power outages all the time. We put natural gas generators in every house we build so that people can stay in their homes when we have -- you know, when the wind blows, or it gets real cold. And so anyway, I'm a -- I'm a big fan of line extensions. I'm a big -- a big fan of what Northwest Natural gas has done for my company over all the years. And I also believe that gas is vilified -- natural gas is vilified like the other fossil fuels were, you know, coal and the gasoline we burn in our cars produces all sorts of nasty crap, but the stuff that I use to heat my home produces very little in terms of emissions. So that's all I had to say. But thank you very much.

40. **Ruth Dallas:** Hi. My name is Ruth Dallas. I call to ask the Commissioners to please reject Northwest Natural rate increase. I can't help wonder why so many builders are on this call and wonder why they're touting everything that Northwest Natural gas already says, most of it which is inaccurate or outright lies. I wonder if these same builders would still support gas appliances if one of their own children developed asthma. Gas appliances in the home increase the development of asthma in children significantly. This is not a trivial disease. As a nurse, I can tell you a parent running to the emergency room with a child who can't breathe is a nightmare. The least Northwest Natural could do, if they are actually concerned about their customers, is to have every gas appliance have a label saying that it is dangerous for children and may produce asthma. It is dangerous for anyone who already has asthma and will increase asthma attacks. I also wonder if these same builders would be able to look their children in the eye when finally, they accept that methane, which the UN has said is our most important emission to control if we are going to get -- reduce climate change in the next 25 years. Will they look their children in the eyes as adults when their

summers are all 116 degrees, when there's forest fires and grass fires everywhere, when we can't breathe the air, when there's floods and storms of every kind. We're seeing climate change happen, just as the scientists said it would, and we need to change. As one of the speakers said, change is hard. Your job is hard. I know a lot of people, they love their gas stoves, but if they knew how dangerous they were, I don't think they would love them so much. And for a few days when your electricity might go out -- it's happened to me, it's no fun. So what? Would I -- would I change that for climate change or for the health of myself or my children? I think that's a crazy thing that anybody would do. So, before Northwest Natural asks for a rate increase, ask them to label every gas appliance with its risk for asthma and respiratory problems, and to label every gas home to let people know, because I don't want to see young families move into a home only to later find out their child developed asthma because of that home. I really appreciate your work you do, and I know this must be awful to sit all night and listen to all of us, but we appreciate it. And I hope you will listen to all of us who are really concerned, and not the people who are touting what Northwest Natural has to say. Thank you.