

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1635 Phase II

In the Matter of)
)
)
NORTHWEST NATURAL GAS)
COMPANY, dba NW NATURAL)
)
Mechanism for Recovery of Environmental)
Remediation Costs)
_____)

**REBUTTAL TESTIMONY
OF THE
CITIZENS' UTILITY BOARD OF OREGON**

May 28, 2014



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OF OREGON
UM 1635

In the Matter of)	
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NORTHWEST NATURAL GAS)	REBUTTAL TESTIMONY OF
COMPANY, dba NW NATURAL)	THE CITIZENS' UTILITY BOARD
)	OF OREGON
Mechanism for Recovery of Environmental)	
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_____)	

1 **I. Introduction**

2 CUB wishes to thank Staff and the other Intervening parties for their thoughtful and
3 considered testimony in this new phase (Phase II) of the UM 1635 docket.

4 **II. The Positions of CUB, Staff and the Intervenors**

5 In Phase II of this docket CUB proposed two additional mechanisms. CUB stands by
6 those mechanisms and encourages the Commission to adopt one of them.

7 However, CUB has also evaluated the proposals offered by Staff and NWIGU in Phase II
8 of this docket and finds that any one of those proposals would also be acceptable to CUB.

9 **III. Conclusion**

10 The Commission should adopt a mechanism from the smorgasbord offered by CUB, Staff
11 and the Intervenors. Any one of these alternate proposal would lead to a better result than the
12 Company's proposal.

UM 1635 – CERTIFICATE OF SERVICE

I hereby certify that, on this 29th day of May, 2014, I served the foregoing **REBUTTAL TESTIMONY OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UM 1635 upon each party listed in the UM 1635 PUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and five copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)
(HC denotes highly confidential)

(C denotes service of Confidential material authorized)

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Respectfully submitted,

A handwritten signature in black ink that reads "Sommer Templet". The signature is written in a cursive, flowing style.

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