1	BEFORE THE PUBLIC UTILITY COMMISSION	
2	OF OREGON	
3	UG 490	
4	In the Matter of	TRANSCRIPT OF
<ul><li>5</li><li>6</li></ul>	NORTHWEST NATURAL GAS COMPANY,	APRIL 16, 2024 PUBLIC COMMENT HEARING
7	Request for General Rate Revision.	
8		
9	BEFORE: ADMINISTRATIVE LAW JUDGE, SARAH SPRUCE	
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24		Transcript Prepared by:
25		Jean Mueller Transcribing PO Box 1049 Lebanon, OR 97355 (541)259-1139
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ALJ SPRUCE: I will provide a brief overview of the process in this proceeding, and then the PUC staff will provide a brief presentation on Northwest Natural's request for a general rate increase and Staff's role in the proceeding.

This public comment hearing is before the Oregon Public Utility Commission, which serves as the regulatory body overseeing utility service in the state including rates and requests for rate changes, such as that requested by Northwest Natural in this proceeding.

Today's public comment hearing is one step of many in these proceedings. After today's hearing, we will prepare a transcript of the comments received, and Commission Staff will file them with their opening testimony in this proceeding along with any other comments received.

All comments will be considered by the Commission, along with other evidence provided by Northwest Natural, Commission Staff and interveners.

In deciding whether and to what extent to grant Northwest Natural's request, in making its

decision, the Commission will balance the interests of utility customers and the utility itself. The Commission could decide to grant the request in full or with changes or deny the request.

In addition to today's public comment hearing, the Commission has scheduled an evidentiary hearing for July  $30^{\rm th}$  and August  $1^{\rm st}$ , and will hear oral arguments from the parties on September  $12^{\rm th}$ .

The Commission anticipates issuing a Final Order in this docket by October  $25^{\rm th}$ , and any new rates would become effective on November  $1^{\rm st}$ , 2024.

Additionally, any members of the public who wish to comment but do not want to do so this evening may submit written comments by e-mailing at PUC.publiccomments@PUC.Oregon.gov or by mail addressed to the Oregon Public Utility Commission, PO Box 1088, Salem, Oregon, 97308-1088. Please include an attention line that identifies the docket as UG 490.

Additionally, members of the public may provide comment by calling Consumer Services at 800-522-2404. Members of the public may request

an interpreter at the time that they call, and will be connected to an interpreter to the extent that one is available for their language.

The consumer representative will provide a summary of any comments received to Staff, and Staff will provide an overview of any comments received by April 23<sup>rd</sup>, 2024 as part of its opening testimony.

If you have any questions about this proceeding, please contact the PUC's Consumer Services team by e-mail at PUC.Consumer @PUC.Oregon.gov, or, again, by phone at 800-522-2404. Additionally, we accept all relay calls.

I will now turn things over to Melissa
Nottingham with Staff for Staff's presentation.

MS. NOTTINGHAM: Good evening. My name is Melissa Nottingham, and I'm the manager of Consumer Services. Part of my role here is to gather public comments, and tonight I'll be providing a high level overview of Northwest Natural's general rate case filing and the potential impact to residential customers. So, I'm just going to pull up my presentation now.

Can you see that, Sarah?
ALJ SPRUCE: Yes.

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1
           MS. NOTTINGHAM: Okay.
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           SUPPORT STAFF: Melissa, it is the
3
     presentation -- it's not the presentation view,
     it's the notes view.
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5
           MS. NOTTINGHAM:
                           Okay. Hold on just a
6
     second. We are -- okay, let me try it again. Let
7
     me try sharing screen. I feel like we have a lot
8
     of technical issues.
9
           (Pause)
10
           MS. NOTTINGHAM: Okay. Okay. How's
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     that?
12
           SUPPORT STAFF: It's the slides.
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           ALJ SPRUCE: Not -- not perfect, but just
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     go with it.
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           MS. NOTTINGHAM: I'm just going to go with
16
     it. I think that's our theme tonight. Anyway, I
17
     just wanted to -- oh, it's gone.
           ALJ SPRUCE: It looks like we lost the --
18
19
     the -- the screen. Make sure it's in the specific
20
     window rather than the general screen sharing
21
     view.
22
           MS. NOTTINGHAM: Yeah. Share screen.
23
     Okay. We'll try again.
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           ALJ SPRUCE: That looks good.
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           MS. NOTTINGHAM:
                           Okay. Whew. Okay.
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Again, I appreciate everybody's patience tonight, really. This -- I appreciate it.

Just to quickly go over this again, the information provided in this presentation is the Company's proposal and doesn't necessarily reflect the final decision. As part of the process, Staff will be reviewing the Company's request to ensure it's reasonable and necessary for providing service to Northwest Natural Oregon's customers.

In the first box we have an example of what your average residential bill looks like right now. So an average customer using 55 therms has a basic charge of \$8 with a residential average of \$79.43. A multifamily looks very much the same. With the proposed November 1<sup>st</sup>, 2024 increase, a single family basic charge would increase to \$10, making the new residential bill \$93.81, or an approximate 18% increase. Multifamily would retain an \$8 basic charge. The average bill would go up about \$12.39 for a 15.6% average increase.

The Company's also proposing to bifurcate new gas service from an existing gas service. Any new service installed after November  $1^{\rm st}$ , 2024 would have a basic charge of \$26.25 for a single family home and \$24.25 for a multifamily home.

Again, the impact for residential customers is driven by the amount of gas that you use.

Base rates is what we're looking at with a general rate case, and these include the cost to serve customers. The Company's proposed base rates would represent about a 30% increase, but if we add in the cost of the commodity -- or in this case it would be gas -- add in those costs, then the average would be approximately 19%.

So, what are driving these rates? The highest bucket is depreciation. And depreciation is how the Company recovers the cost of equipment and other capital investments over the lifetime of the asset.

The next bucket is operation and maintenance. This is the daily operational costs of running the utility. This includes labor, maintenance, routine repair, facilities, insurance, administration, safety, training, et cetera.

The next bucket is capital projects, unlike depreciation these are new investments. The proposal is a central resource center, which is a building to expand the Company's footprint in the community, also including some seismic upgrades to

existing buildings, a meter modernization program to replace meters at the end of their life, as well as build in some efficiencies into the meter reading, and the creation of gas storage in order to allow the Company to meet winter peak loads.

To review Northwest Natural's proposal, the Public Utility Commission employs experts from a variety of areas. Rate cases are complex. The company must demonstrate their spending is necessary, prudent and reasonable. Staff's responsibility encompasses a range of tasks from technical analysis, economic review, how the costs are distributed among different types of customers.

To do this type of analysis, we have a team of accountants, financial analyst, economists and engineers to make sure the proposed projects, the forecast and any modeling used is reasonable.

Legal guidance is provided by the

Department of Justice. Bottom line is to make

sure that Oregonians have safe and reliable

service at a good -- at a just rate.

This is a -- unlike -- like a legal proceeding, the next steps will include the Staff responding with their opening testimony. We've

already started the process of requesting additional information from the Company to support their filing, and -- and that'll go through -- we'll have testimony, if there's any settlement positions, these are some of the potential outcomes. The attorneys, working with Staff, will cross-examine witnesses, submit legal briefs, and make oral arguments.

I strongly encourage everyone to follow the docket and receive updates by going to www.Oregon.gov/PUC and follow UG 490.

Tonight the part of the process is most important is to hear the issues that are important to you, so I encourage everyone to participate and let -- while you have the Commission hearing, let us know what is important to you as far as this rate case.

I want to thank, again, everybody for their patience tonight. I look forward to hearing your feedback. And, again, if we have any other questions, please contact Consumer Services at the information provided on the other presentation or 1-800-522-2404.

Thank you.

ALJ SPRUCE: Okay. Thank you, Melissa.

So, we are now going to get to the public comment portion, which I know is why many, if not most of you are here. So let me go over the process we will be following tonight to help ensure that everyone has a chance to speak.

First, just as a reminder, though if you're not in a channel I don't know how helpful this will be, but please make sure you have selected either the English or Spanish channel after clicking the interpretation button at the bottom of your screen. If you click the Spanish option, you will hear a Spanish translation of everything this evening, and will be able to have your comments translated from Spanish to English if you do provide comments in Spanish.

Second, we received a number of public comments from folks requesting to speak at this hearing. We are aware of those requests, but for tonight we are asking folks instead to use the "Raise your hand" function of Zoom, and I will call on people in the order that I see them on my screen. You do not need to raise your hand just yet, we will be getting to that in a moment.

For participants using a PC, you can find the "raise your hand" function under the

"reactions" menu at the bottom of your screen or you may just see the button "Raise hand." If you are on a Mac or an iPad or iPhone, you may need to click on the "More" button at the bottom of your screen to find the "Raise your hand" function.

For those of you that are joining us by telephone, you can raise your hand by pressing star nine. I will call on individuals by name or the visible digits of your phone number when it is your turn to speak, and I will unmute you at that time. You may also need to unmute your computer, microphone, or telephone at that time.

We have an additional issue tonight in that it seems as if we had an incorrect link go out, and so we have a number of folks that are in under the same name. For those of you who wish to comment and are in under that name, I will do my best to try to identify you so that you know it is you. We do have the ability to request people to unmute, so once we allow you to talk to provide your comment, we will push your request for you to unmute so that ideally you know that you are the person who -- whose turn it is to speak.

Okay. So this is an opportunity for you to offer comments on Northwest Natural's rate

request.

The Commissioners will be listening carefully, but will not be answering questions, responding to individual comments tonight.

So, I see a number of people have already done it, but at this time I ask that anyone wishing to provide comment raise your hand so that I can get an idea of how many people are here and interested in commenting tonight.

Okay. All right. So we have quite a number of people. Thank you everyone. I just have a few more instructions before I start calling on folks.

So when you're called on to speak, please speak clearly and state your name for the record. Your comments are being recorded, and we want to ensure that they can be heard clearly, as well as translated.

When speaking, please provide a brief summary of your views. We already have quite a few people here who would like to speak, and I will, again, be checking in as the night goes on to see if more folks want to who haven't joined yet. But to help us hear from as many of you as possible tonight, I would ask you to please avoid

repeating statements already made by others, and instead state your support what others have said wherever possible.

We're probably going to require about three minutes or less. I will do my best to let you finish your statement before I interrupt you just to let you get to the end of a sentence, but we're going to cap folks at three minutes to ensure that everybody has a chance to speak tonight.

On that note, if you have prepared written comments, we would ask you to submit those rather than reading those, and to summarize them when you speak. But if you are going to be reading a prepared statement, please make sure that you speak slowly. You may need to artificially slow yourself or you may speak too fast for the translator. At the end of your comments, please let us know that you are done speaking.

So with that, we'll go ahead and get started.

And, again, for anybody who's just joining, if you would like to provide comments, please use the "raise your hand" function, Zoom. If you are calling in this evening, please press star nine to use "raise your hand," and I will call on people

in the order that they appear on my screen.

So the first person with a hand raised is David Reed. David, you may provide your comment when you are ready.

(No audible response)

ALJ SPRUCE: Okay. David, I'm going to ask one last time if you'd like to give your comment. You may need to unmute. Yes. There you go. Thank you. David, if you could state and spell your name for the record before you provide your comment?

(No audible response)

ALJ SPRUCE: Okay. With that, I'm going to go ahead and mute you again and move you back, remove the permission to talk. If you would like to -- still like to provide comment later, please raise your hand again and we will circle back around to you.

So the next -- next person that I see on the attendees list here is Max Bondar -- Bondar. I apologize if I have mispronounced your name.

Okay.

Mr. BONDAR: No worries.

ALJ SPRUCE: Hi. If you could please state and spell your name for the record before you

provide your comment.

MR. BONDAR: Hi. My name is Max Bondar, M-a-x, last name's Bondar, B-o-n-d-a-r.

ALJ SPRUCE: Okay. And you may provide your comment when you're ready.

MR. BONDAR: Thank you.

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

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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 To our knowledge, there's currently labor costs. 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.

ALJ SPRUCE: Thank you.

Okay. And the next person I see on the list

is Mike Erdmann.

MR. ERDMANN: All right. Can you hear me?

ALJ SPRUCE: I can hear you. If you could please state and spell your name for the record and then you may provide your comments.

MR. ERDMANN: I will. So, Mike Erdmann, spelled E-r-d-m-a-n-n.

And 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.

ALJ SPRUCE:

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1 And finally, I want to stress that these 2 line extension allowances are not subsidies 3 provided to developers, they're ultimately paid for 4 by the very customers that connect to the gas 5 system in that subdivision, and that, frankly, 6 further reducing or even eliminating those line 7 extension allowances increases development costs, 8 and that makes housing more expensive, and 9 ultimately conflicts with the Governor's goal of 10 both increasing housing production and making 11 housing more affordable. 12 And, of course, existing Northwest Natural 13 customers benefit because the additional new 14 hookups help absorb some of the fixed costs of the 15 system. 16 So, I'll wrap it up. We would just urge the 17 Commission to support the changes to the line 18 extension allowances contained in the -- in the 19 filing. 20 Thank you. 21 ALJ SPRUCE: Okay. Thank you. 22 All right, the next person I see on the list 23 is Jed Bennet. 24 MR. BENNETT: Yes. Can you hear me?

I can hear you. If you could

please state and spell your name for the record, and then you may provide your comment.

MR. BENNETT: Yes. My name is Jed Bennet, spelled J-e-d B-e-n-n-e-t-t.

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.

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1 ALJ SPRUCE: Okay. Thank you. 2 Okay, and the next person I see on the list 3 is Dineen O'Rourke. Good evening. Can you hear 4 MS. O'ROURKE: 5 me? 6 ALJ SPRUCE: Yes. I can hear you. 7 again, if you could just state and spell your name 8 for the record, and then you may provide your 9 comment. 10 MS. O'ROURKE: Yes. My name is Dineen 11 O'Rourke, it's D-i-n-e-e-n. And I am the campaign 12 manager for 350 PDX. 13 Thanks for the opportunity to testify this 14 evening. 15 So, 350 PDX is a people powered grassroots 16 organization that's been working in our region for 17 over 10 years. We are fighting the causes of the 18 climate crisis through justice-based solutions. I am testifying today to request that the 19 20 Commission reject Northwest Natural's deeply flawed 21 proposal. Northwest Natural's proposal will prop 22 up its polluting gas system in the face of emission 23 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.

Thank you.

ALJ SPRUCE: Okay. Thank you.

All right. And next on the list we have

Justin Wood.

MR. WOOD: Hi there. Can you hear me?

ALJ SPRUCE: Yes, I can hear you. And,

again, if you could go ahead and just state and

spell your name for the record, and then you may

provide your comment.

MR. WOOD: My name is Justin Wood, as it sounds, W-o-o-d.

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.

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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.

ALJ SPRUCE: Okay. Thank you.

All right. And then just a general reminder for folks, when you're speaking, just make sure to try to talk -- or try not to talk terribly fast, just to make sure our translators are able to -- to translate and keep up with you.

So, the next person on the list is Randy Sebastian.

(No audible response)

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1 ALJ SPRUCE: All right. And you may need 2 to unmute on your end. 3 MR. SEBASTIAN: Done. Unmuted. 4 ALJ SPRUCE: Okay. 5 MR. SEBASTIAN: Thank you. 6 ALJ SPRUCE: All right. If you could 7 please state and spell your last your name for the 8 record, and then you may provide your comment. 9 MR. SEBASTIAN: Yes. Hi. Randy Sebastian, 10 R-a-n-d-y S-e-b-a-s-t-i-a-n. 11 I am also a homebuilder, and I agree with my -- my other peers in allowing clients, our new 12 13 homeowners, to have options for heating water and 14 also cooking. 15 I have got a different business model. 16 homes start around two million dollars. My clients 17 will demand gas no matter what, and most of our 18 homes have included natural gas fired furnaces --19 or, excuse me, natural gas fired generators or 20 they're wired for them. And my concern is not for 21 me, but it's for the other builders that are trying 22 to provide options for their clients. And I see it 23 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.

ALJ SPRUCE: Okay. Thank you.

Okay. And then next on the list I see Pat Delaquil. And I'm so sorry if I have mispronounced that.

MR. DELAQUIL: That's quite all right. Can

you hear me?

ALJ SPRUCE: Yes. And you may go ahead and state and spell your name for the record, and then provide your comment when you are ready.

MR. DELAQUIL: It's Pat Delaquil, D-e-l-a-q-u-i-l.

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:

- 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 longterm storage reliability and hard to electrify applications.

Unfortunately, Northwest Natural continues to promote the false promise of 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

1 to subsidize any fossil fuel infrastructure, nor 2 should we be incentivizing new buildings to connect to the gas system. We shouldn't be governed by 3 past solutions. Low housing costs will mean 4 5 nothing if we continue to ignore the climate 6 crisis, especially with the escalating cost of gas, 7 which saddles low income customers with high bills 8 and questionable redundancy. 9 I urge you, the Commission, not to allow any 10 portion of this rate case. 11 Thank you. 12 Thank you. ALJ SPRUCE: Okay. 13 Okay. And next I see Nataliya Pirumova. 14 And, again, I'm so sorry if I mispronounced that. 15 No, that's correct. MS. PIRUMOVA: 16 My name is Nataliya Piramova, it's N-a-t-a-17 l-i-y-a P-i-r-u-m-o-y-a. And I'm here on behalf 18 of Families for Climate. 19 I'm testifying to request that the 20 Commission reject Northwest Natural's efforts to 21 use ratepayer dollars in support of their 22 investments and false solutions, like renewable 23 natural gas and green hydrogen and mitigate risks 24 to ratepayers from continued expansion of the gas

25

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 bio-gas 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.

ALJ SPRUCE: Okay. Thank you.

And next on the list I see Jay Clark. Oh, well I guess that hand went down and we have one of our mystery speakers, the Christy Collins speaker. Hi. I see you've already unmuted. If you could go ahead and state and spell your name for the record before you provide comment.

MS. LEHMAN: Hi. This is Nora Lehmann. And that's Nora L-e-h-m-a-n-n.

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 bio-gas 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.

ALJ SPRUCE: Okay. Thank you.

All right. And then I see the name I was originally trying to call, and I'm not 100% sure what happened there, the hand is still up, so I'm going to go slightly out of the order I now see for whatever reason, and Jay Clark, you may go ahead and unmute.

MR. CLARK: Hi.

ALJ SPRUCE: Okay. Thank you. If you could go ahead and state and spell your name for the record before you provide your comment.

MR. CLARK: Sure. My name is Jay Clark, and I am the Director of Government Relations at the Portland Metro Chamber, J-a-y C-l-a-r-k.

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

1 approve the line extension allowance as proposed by
2 Northwest Natural.

We thank you for your time and consideration.

ALJ SPRUCE: Okay. Thank you.

Okay. And next on the list I see Harvey Gail.

MR. GAIL: Hello? Can you hear me?

ALJ SPRUCE: Yes, I can hear you. And if you could go ahead and state and spell your name for the record, and then you may provide your comment.

MR. GAIL: Yes. I'm Harvey Gail, it's H-a-r-v-e-y, last name Gail, G-a-i-l.

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

1 allowance proposal by Northwest Natural. 2 Thank you very much. 3 Thank you. Okay. ALJ SPRUCE: 4 Next on the list I see Jeremy Osterholm. 5 MR. OSTERHOLM: Good evening. 6 ALJ SPRUCE: Good evening. If you could 7 please state and spell your name for the record, 8 and then you may provide your comment. 9 MR. OSTERHOLM: Yeah. My name is Jeremy 10 Osterholm, J-e-r-e-m-y O-s-t-e-r-h-o-l-m. 11 I'm the 2024 Board President for the Home 12 Building Association of Greater Portland. I'm also 13 the owner and President of OsterCraft Homes, Inc., 14 where I am a second generation homebuilder in the 15 metro area. 16 I come before you today in support of the 17 Northwest Natural gas line extension agreement The Home Building Association of Greater 18 proposal. 19 Portland, also known as the HBA, is dedicated to 20 maximizing housing choice for all who reside in our 21 region. Our members are industry professionals 22 across the Portland metro region in six counties, 23 40 cities, and many more service and utility

As Justin mentioned earlier, our members

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25

districts.

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.

ALJ SPRUCE: Thank you.

Okay, next on the list I see Paul Vogel.

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1
                        Good evening. My name is Paul
           MR. VOGEL:
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     Vogel, V-o-g-e-l.
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            I submitted written testimony, so I'd just
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     like to provide a -- just a synopsis. I live and
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     work in rural Oregon. Oregon has energy supply
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     constraints, we have housing constraints, we have
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     carbon reduction and climate goals, we have
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     increasing clean fuel standards, and it's time for
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     innovation and options that encourage housing,
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     facilitate workforce supply and distribution and
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     also encourage energy resilience and
     responsibility.
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            So we strongly encourage your approval of UG
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     490.
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            Thank you.
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           ALJ SPRUCE:
                          Okay. Thank you.
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           Next on the list I see Mica McOmber.
            (No audible response)
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            ALJ SPRUCE: You can go ahead and unmute.
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            MR. MCOMBER: Can you guys hear me now?
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            ALJ SPRUCE:
                          Yes.
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           MR. MCOMBER:
                          Thank you.
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            ALJ SPRUCE:
                          If you could go ahead and
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     state and spell your name for the record, and then
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     you may provide your comment.
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1 MR. MCOMBER: Thank you.

Mica McOmber, M-i-c-a M-c-O-m-b-e-r.

I've been a homebuilder for 25 years in Lane 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

1 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.

ALJ SPRUCE: Okay. Thank you.

Okay. And next I see another one of the duplicate Christy Collins entries. I'm going to allow you to talk and ask you to unmute so that you

know who I'm referring to. And if you could go ahead and state and spell your name for the record, and then you can provide your comments.

MR. KORSC: Yes. Hello. My name is

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.

ALJ SPRUCE: Thank you.

Okay. And the next person on the list is

Jane Stackhouse. Okay. If you could go ahead and
please state and spell your name for the record,
and then you may provide your comment.

MS. STACKHOUSE: Yes. Thank you, Chair Decker and Commissioners Tawney and Perkins.

My name is Jane Stackhouse, spelled J-a-n-e, Stackhouse, S-t-a-c-k-h-o-u-s-e.

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

1 a low interest rate and complete the full 2 Stackhouse electrification process at one time. feel for low income customers and renters who do 3 4 not have that option. Customers should not have 5 to pay for the shortsightedness of their energy provider, especially those customers who have 6 7 limited options. 8 Northwest gas has viable business options, other than the ones they propose of different 9 10 types of gas, and we really need to encourage them 11 to look into these other options. 12 Please deny the rate increase. It may help 13 them consider other, better, cleaner business 14 models. 15 Thank you very much for the time. 16 ALJ SPRUCE: Thank you. 17 Okay, next on the list I see Maria Delorres. 18 Okay. You should be able to unmute now. 19 MS. DELORRES: Si. (Speaking Spanish) 20 ALJ SPRUCE: Okay. Perfect. And you can 21 go ahead and state and spell your name for the 22 record, and then you may provide your comment when 23 you're ready. 24 (The following is translated from Spanish to 25 English:

MS. TORRES: Hello, my name is Maria, Maria
Torres, M-a-r-i-a T-o-r-r-e-s.

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

1 power cuts for low income families or those with 2 little or no access to assistance programs. 3 affects mental health as they lose these fundamentals without these necessities and 4 causes frustrations. 5 6 They are affected by the extra charges for 7 being disconnected and then reconnected. When the 8 few resources are lost, that causes trauma at the 9 family level, et cetera. 10 Is there some question that needs an answer? 11 Where is the equity? How can I receive help Yes. 12 if I do not meet the requirements, the majority of 13 the time are absurd. Where do I go if I do not 14 have valid insurance or check stubs to prove my 15 income? 16 If I do not qualify for help when only \$20 17 dollars separate me from the low income 18 qualification table? And many more questions to 19 enumerate. 20 Thank you very much for listening to my 21 testimony. 22 ALJ SPRUCE: Thank you. 23 Okay. And the next person I see on the

Okay. And the next person I see on the list is Lisa Arkin. Okay. Perfect. If you could --

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1 MS. ARKIN: Thank you.

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My name is Lisa Arkin, L-i-s-a A-r-k-i-n.

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 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 brittlization 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.

ALJ SPRUCE: Thank you.

Okay, and the next person on the list is Brian Stewart. Okay.

MR. STEWART: Hello. My name is Brian Stewart, that's B-r-i-a-n S-t-e-w-a-r-t.

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

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1
     gave in Northwest Natural's integrated resources
2
     plan to appropriately consider and incorporate
     electrification into the utilities decarbonization
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4
     strategy.
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            Thank you.
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                          Thank you.
            ALJ SPRUCE:
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            Okay. Next on the list I see Bethany
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     Cotton.
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            MS. COTTON:
                          Good evening.
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            For the record, my name is Bethany Cotton,
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     B-e-t-h-a-n-y, Cotton like the fabric, C-o-t-t-o-
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     n.
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            Chair Decker and Commissioners Tawney and
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     Perkins, thank you for the opportunity to comment.
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            I am a resident of Eugene and,
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     unfortunately, a Northwest Natural ratepayer.
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     ask that you deny Northwest Natural's proposal.
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     As a ratepayer, I do not want my dollars to
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     further subsidize new hookups that wed us to a
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     fossil fuel proven toxic to our health and
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     climate, creating more expense in the coming years
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     when we inevitably electrify the grid.
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            As an environmental lawyer and an auntie to
24
     two kiddos under three, I'm deeply concerned about
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     Northwest Natural's concerted efforts to undermine
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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.

ALJ SPRUCE: Thank you.

Okay. And the next person I see on the list is another of the Christie Collins folks, so I'm

going to allow you to talk and I'm going to ask you to unmute. You should see that message, and I will -- okay, thank you. I see you've unmuted. If you could state and spell your name for the record, then you may provide your comment.

MS. PALM: I'm Deanna Palm, D-e-a-n-n-a, P-a-l-m. 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.

ALJ SPRUCE: Okay. Thank you.

Okay, and the next person I see is Katherine Backs.

MS. TURNER: Yes. Actually, this is Ann Turner. My partner's name always appears on my Zoom. And my name is spelled A-n-n T-u-r-n-e-r.

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 homebuilders 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

1 and hydrogen into its strategy to reduce 2 greenhouse gas emissions to meet Oregon's climate 3 goals and to support affordability for 4 environmental justice communities by not 5 increasing rates. 6 Thank you so much for all you're doing and 7 the opportunity to comment this evening. 8 ALJ SPRUCE: Thank you. 9 Okay, and the next person I see on the list 10 is Linda Kelley. 11 MS. KELLEY: Chair Decker, Commissioner 12 Tawney, thank you for the opportunity to testify 13 today. 14 My name is Linda Kelley, K-e-l-l-e-y, and I 15 currently volunteer with 350 Eugene, whose focus 16 is on climate problems and solutions. 17 I have formerly worked with Bay Area Air 18 Quality Management District in their source 19 testing lab. 20 I'm testifying today to request the 21 Commission reject the utility's efforts to use 22 ratepayer dollars in support of their investments 23 in projects like renewable natural gas and green

While there can be some very limited use for

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hydrogen.

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 parish 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.

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           A few more things I wanted to say is --
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           ALJ SPRUCE:
                          I'm so sorry to interrupt, I
3
     just wanted to let you know --
                        Am I over time?
4
           MS. KELLEY:
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           ALJ SPRUCE: -- you are -- yes, you are
6
     over three minutes, so if you want to just wrap
7
     up --
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           MS. KELLEY:
                         I'm --
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           ALJ SPRUCE: -- I appreciate it.
                                               Thank
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     you.
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           MS. KELLEY:
                         I think I'm fine.
12
           The only other thing I'd like to say is when
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     the homebuilders talk about options, I want people
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     to remember that our children need options for a
15
     clean healthy future.
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           So, thank you so much for taking my
17
     testimony.
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           ALJ SPRUCE:
                          Thank you.
19
           Okay. And the next person we have on the
     list is Chloe Wilson.
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           MS. WILSON: Hello. Can you hear me?
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           ALJ SPRUCE: Yes, I can.
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           MS. WILSON: Okay. Thank you so much. My
24
     name is spelled C-h-l-o-e W-i-l-s-o-n.
25
           Hello, Chair Decker and Commissioners Tawney
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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 charged on new single family and multifamily occupants will burden new homeowners with a charge they can do nothing 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

1 energy consumption, loss of energy value, and low cost effectiveness. 2 3 I'm concerned about the unrealistic and 4 misleading claims gas companies have been making 5 about the availability, costs, and benefits of 6 these renewable energies. 7 I really urge that the Commission take 8 account of the -- sorry -- I really urge that the 9 Commission will be skeptical of Northwest 10 Natural's plan to promote renewable natural gas in 11 the future. There are other options that we can 12 consider that will be a lot more cost effective 13 and more valuable in the future. 14 Thank you. 15 ALJ SPRUCE: Thank you. 16 Okay. And next on the list I see Kailani 17 Rue. MS. RUE: 18 Can you hear me? 19 ALJ SPRUCE: Yes.

MS. RUE: My name is Kailani Rue, K-a-i-l-a-n-i and R-u-e.

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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 longterm decarbonization strategy.

This proposal is highly risky and will only damage our climate. Because of this, I ask that

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1
     you strongly reject this deeply flawed proposal.
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            Thank you.
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            ALJ SPRUCE:
                          Thank you.
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            Okay. And the next person on the list is
5
     Craig Schuck.
                          Hi, there. Good evening.
6
           MR. SCHUCK:
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           ALJ SPRUCE:
                         Hi.
8
           MR. SCHUCK:
                          Okay.
9
            ALJ SPRUCE: Sorry, please go ahead.
10
                          Yeah, that's fine.
           MR. SCHUCK:
11
           My name is Craig Schuck, it's C-r-a-i-g
12
     S-c-h-u-c-k.
13
            And I'm a homebuilder in the Portland
14
     Metropolitan area and have been for -- since 1989.
15
            I don't want to repeat anything that any of
16
     the other homebuilders said, so there's a couple
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     things I'd like you to think about, and one of
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     them is, is that homebuilders aren't here to
19
     support Northwest Natural Gas -- and I do support
20
     the proposed line extension allowance -- we're not
21
     here to support it because of some kind of
22
     collusion or relationship with Northwest Natural
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     Gas, we're here to support it because it works.
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     It's cost effective, and it's what the buyers
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     want.
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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. Ιf electrification and electric appliances were as cost effective as what you're hearing tonight, builders would be using them en masse. 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 ques

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.

ALJ SPRUCE: Thank you.

Okay. The next person on the list is Silvia Tanner.

MS. TANNER: Thank you.

For the record, I am Silvia Tanner, and my name is spelled Silvia, S-i-l-v-i-a, last name Tanner, T as in tango-a-n-n-e-r.

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 frameworker 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.

ALJ SPRUCE: Thank you.

Okay, and next on the list I have Wendy

Woods.

MS. WOODS: Can you hear me?

ALJ SPRUCE: Yes, I can hear you.

MS. WOODS: Oh, good.

Good evening Chair Decker and Commissioners Tawney and Perkins, my name is Wendy Woods, W-e-n-d-y W-o-o-d-s.

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 biogas, 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

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     is granted.
2
            Thank you for your consideration.
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            ALJ SPRUCE:
                          Thank you.
            Okay, and next on the list I see Maria
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5
     Hernandez. You can go ahead and unmute.
6
            (No audible response)
7
           ALJ SPRUCE:
                          Okay.
8
           MS. HERNANDEZ SEGOVIANO: Can you all hear
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     me?
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           ALJ SPRUCE:
                          Yes.
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           MS. HERNANDEZ SEGOVIANO: Oh, one second.
     I'm hearing double, so just bear with me.
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13
            ALJ SPRUCE: I was hearing it at first,
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     too, but the last time you were speaking it
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     sounded fine, so I think you're all right.
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           MS. HERNANDEZ SEGOVIANO: Okay. Do I sound
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     better?
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            (No audible response)
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            MS. HERNANDEZ SEGOVIANO: Okay. Perfect.
20
     Hi.
         Thank you.
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            Thank you Chair Decker and Commissioners
22
     Tawney and Perkins and the PUC.
23
            For the record, my name is Maria Hernandez
24
     Segoviano, that's spelled M-a-r-i-a H-e-r-n-a-n-
25
     d-e-z, Segoviano, S-e-g-o-v-i-a-n-o.
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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

1 sure that my kid is able to live in a world where 2 we're not actually going backwards, but we instead are continuing to move forward. 3 4 Thank you so much. 5 ALJ SPRUCE: Thank you. 6 Okay, next on the list is Anne Pernick. 7 MS. PERNICK: Hi. Can you hear me all 8 right? 9 ALJ SPRUCE: Yes. 10 Ms. PERNICK: Thank you Chair Decker, 11 Commissioner Tawney, Commissioner Perkins, Judge 12 Spruce and Staff for the opportunity to testify 13 today. 14 My name is Anne Pernick, and that's spelled 15 A-n-n-e, and then last name is P-e-r-n-i-c-k. And I am with SAFE Cities at Stand. Earth. 16 17 I am testifying today to request that the 18 Commission reject the utility's efforts to 19 increase its ratepayer funded subsidies for many 20 new gas connections, and instead order it to end 21 these outdated, expensive and climate damaging 22 subsidies. 23 Please build on the clear direction that you 24 gave in Northwest Natural's integrated resource

plan to appropriately consider and incorporate

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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.

ALJ SPRUCE: Thank you.

Okay, next I see Bill Krasnogorov, and I am so sorry if I've mispronounced that.

MR. KRASNOGOROV: Good evening. My name is Bill Krasnogorov, spelled B-i-l-l K-r-a-s-n-o-g-o-r-o-v.

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

1 source. 2 That said, I would like to voice my support 3 for the line extension allowance proposed by 4 Northwest Natural. 5 Thank you. 6 ALJ SPRUCE: Thank you. 7 Okay. And next on the list we have Alan 8 Journet. 9 MR. JOURNET: Hello. 10 ALJ SPRUCE: Hi. 11 MR. JOURNET: My name is Alan Journet, 12 A-l-a-n J-o-u-r-n-e-t. 13 Chair Decker and members of the Public 14 Utilities Commission, thank you for the 15 opportunity to testify. 16 Following a career of teaching biology at 17 Southeast Missouri State University, I have 18 relocated to Southern Oregon and co-founded and 19 now serve as co-facilitator of Southern Oregon 20 Climate Action Now. I testify today on behalf of 21 SOCAN, an organization of over 2,000 rural 22 Southern Oregonians who are concerned about the 23 climate crisis. 24 Although we do not live in the franchise 25 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.

ALJ SPRUCE: Thank you.

Okay. Next I see Representative -- oh, it's -- I'm sorry, it starts to cut off -- Representative Mark, and then I'm just going to

25 hit -- allow you to talk -- Mark Gamba. Sorry

about that. You may unmute. Thank you.

MR. GAMBA: Good evening, Chair Decker, Commissioners Tawney and Perkins. Thank you for the opportunity to testify today.

My name is Mark Gamba, M-a-r-k G-a-m-b-a.

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

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     fossil methane use to near zero in our lifetimes.
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     Continuing to allow an industry from the past to
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     damage our futures while impoverishing our
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     residents is clearly not in our state's best
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     interest.
6
            Thank you for your time and consideration.
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            ALJ SPRUCE:
                          Thank you.
8
            Okay, and next on the list I see Jeff Kugel.
9
            MR. KUGEL:
                         Yeah. Hi, there. Can you hear
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     me?
11
            ALJ SPRUCE:
                          Yes.
12
           MR. KUGEL:
                        Yeah. My name's Jeff Kugel,
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     J-e-f-f K-u-q-e-l.
14
            I work as a Director of Power Supply for
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     PNGC Power, which is one of Oregon's only
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     generation insurance mission cooperatives, so
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     we're like REI for electricity, I like to say.
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     And we represent roughly four percent of the
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     Oregon retail load in the state. And we kind of
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     have a different flavor when we look at the -- you
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     know -- we're going to comment on the line load --
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     or the line extension allowance, sorry, and we're
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     in favor of that.
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            We have considerable resource adequacy
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     problems. Obviously the variable (indiscernible)
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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 allowance, 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.

ALJ SPRUCE: Thank you.

Okay, and next we have Eli Spevak. And, again, I apologize if I -- if I have mispronounced that.

MR. SPEVAK: Judge Spruce, Chair Decker and Commissioners of the PUC, my name's Eli Spevak.

You came close. It's E-l-i S-p-e-v as in Victor-a-k.

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 infloor 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

ALJ SPRUCE:

1 weekend, come check out HBA's Homes of Tomorrow 2 Today tour to check out some just built electric 3 homes in person. If you stop by say hi. 4 Thank you. 5 Thank you. ALJ SPRUCE: 6 Okay. And next I see another one of our 7 Christie Collins folks. I'm going to hit "allow 8 you to talk," ask you to unmute, and hopefully you 9 get that notice telling you that you should unmute 10 and it's your turn to speak. 11 (No audible response) 12 ALJ SPRUCE: Okay. I'm going to give one 13 more second to see if you're able to unmute. 14 Okay. What I'm going to do is circle back around 15 to you -- oops, apologies. Okay. Now, I'm going 16 to hit "ask to unmute." And if you receive that, 17 you can go ahead and unmute. Okay. It looks like 18 you're unmuted, but I'm not hearing you speak, so 19 I just wanted to --20 MR. HESLAM: Oh --21 ALJ SPRUCE: -- check to make sure. 22 MR. HESLAM: Sure. Can you hear me now? 23 ALJ SPRUCE: Yes. 24 MR. HESLAM: Great.

Okay.

MR. HESLAM: Chair Decker and Commissioners

Perkins and Tawney, my name is David Heslam. For

the record, that's spelled D-a-v-i-d H-e-s-l-a-m.

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.

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1
            I appreciate it.
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           ALJ SPRUCE:
                          Okay. Thank you.
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           All right. And we have another Christie
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     Collins.
               I have asked you to unmute. Hopefully
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     you saw the message. If so, go ahead and unmute.
6
     Great.
7
           MR. SALINGER:
                            Yeah.
                                   I'm seeing the
8
     unmute, but I'm not part of the Christie Collins
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     thing, so --
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           ALJ SPRUCE:
                          Unfortunately, you're just --
11
     your display name is Christie Collins.
12
           MR. SALINGER:
                            Okay.
13
           ALJ SPRUCE:
                          I had an issue with one of the
14
     links. So, if you could go ahead and just state
15
     and spell your name for the record, and then you
16
     can provide your comment.
17
            MR. SALINGER: Great.
                                   Thanks.
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            So, my name is Josh Salinger, so J-o-s-h
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     S-a-l-i-n-q-e-r.
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            And I'm a builder in Portland, Oregon,
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     Birdsmouth Design-Build is our company, been in
22
     business about 15 years.
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           And Chair Decker, Judge Spruce,
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     Commissioners Tawney and Perkins, I'd just like to
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     take this -- I'm testifying today to request that
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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 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.

ALJ SPRUCE: Thank you.

And then the last person I see in the queue is -- appears as Oregon PSR. Oh, so I'm going to hit "allow to talk," and then -- there you go. If you could go ahead and state and spell your name for the record, and then you may provide your comment.

MS. HERNANDEZ: Yes. Good afternoon Commission -- or, I guess, good night.

My name is Samantha Hernandez, S-a-m-a-n-t-h-a H-e-r-n-a-n-d-e-z.

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 10<sup>th</sup> 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 means 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 upfront 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.

ALJ SPRUCE: Thank you.

Okay. So I see we have two more folks who joined the queue. This is going to be the last two, and I'm sorry for anybody else who was hoping to jump on, but we do have to -- to start wrapping things up.

But just as a reminder for folks, though, if you did not get an opportunity to comment tonight, you may still submit written comments. And you can find more information on that on our website.

So, I'm going to go ahead and call Tom Walter. You may unmute.

MR. WALTER: Okay. Can you hear me?

1 ALJ SPRUCE: Yes.

MR. WALTER: All right. Well, thank you very much, Commissioners.

Tom Walter, T-o-m W-a-l-t-e-r.

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 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.

ALJ SPRUCE: Thank you.

Okay, and then finally we have Ruth Dallas. You may unmute.

MS. DALLAS: Hi. My name is Ruth Dallas, R-u-t-h D-a-l-l-a-s.

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.

ALJ SPRUCE: Thank you.

All right. So that's everyone we have for comment tonight. I want to thank everyone for providing comments.

As I just said earlier, I'd like to remind everyone that you still may submit written comments by mail or by e-mail to the Commission or by calling the Consumer Service division. The

1 details for how to submit comments are included in 2 the notice for this hearing and on the 3 Commission's website. 4 I will now turn it back over to Chair Decker 5 for any closing remarks. 6 CHAIR DECKER: I appreciate everyone coming 7 tonight. We heard quite a range of perspectives, 8 and that is great fodder for the deliberative 9 process that we undertake in reviewing rate 10 requests. Everyone, we appreciate your patience 11 and we hope you have a great rest of your night. 12 ALJ SPRUCE: Okay. Thank you all. 13 Again, I want to reiterate I really 14 appreciate everyone bearing with us while we had 15 the technical difficulties earlier in the evening. 16 This concludes the public comment hearing 17 for Northwest Natural Gas Company in UG 490. 18 And, Cheryl, you can end the meeting when 19 you are ready. 20 (End of Proceedings) 21 22 23 24

25

1	STATE OF OREGON )
2	) ss. COUNTY OF Linn )
3	
4	I, Jean Mueller, a Court Transcriber for the
5	State of Oregon, do hereby certify that I transcribed
6	the audio proceedings had upon the public comment
7	hearing of this cause, previously captioned herein;
8	that I thereafter had reduced by typewriting the
9	foregoing transcript; and that the foregoing transcript
10	constitutes a full, true, and accurate record of the
11	proceedings had upon the hearing of said cause, and of
12	the whole thereof.
13	Dated: April 29, 2024.
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16	Jean Mueller Court Transcriber
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I, Stefanie de Gruyter, a Court Reporter and Transcriber for the State of Oregon, do hereby certify that I transcribed the Spanish speaking portion of the audio proceedings, at pages 50 through 52, in the public comment hearing of this cause, previously captioned herein, and it is an accurate record of that portion of the proceedings.

Dated: April 29, 2024.

Stefanie de Gruyter

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