NW Natural®

250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

October 15, 2025

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: AR 641 – NW Natural Comments

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), provides the following comments in response to the Public Utility Commission of Oregon's ("Commission") Memorandum issued on September 8, 2025 in the above-referenced docket ("Memorandum").

Comments on Memorandum Questions

NW Natural provides the following in response to the questions posed in the Memorandum:

- ***Should any rules be addressed in more than one module? For example, I intend to include continued discussion of the primary rule on definitions, OAR 860-001-0010, in each module as we are likely to discuss needed definitions during the workshop for each module.***

  Response
  NW Natural agrees with the proposal to include OAR 860-001-0010 in each module. NW Natural has not identified any other rules that should be addressed in more than one module.

- ***How should the modules be sequenced?***

  Response
  NW Natural proposes the following sequence and combinations of modules:
  1. Combined modules 1 and 5
  2. Module 4
  3. Combined modules 2 and 3
  4. New module (please see the Company's response to next question)

- ***Are there any subjects not covered by the existing Division 001 rules that should be discussed during one or more modules? For example, I have added potential new rules related to orders in other than contested cases under the Oregon Administrative Procedures Act.***

  Response
  NW Natural has not identified any additional subjects not covered by existing Division 001 rules, but suggests that any potential new rules should be addressed in a separate module after the existing Division 001 rules have been discussed.

- ***How can we make these workshops more accessible to stakeholders?***

  Response
  NW Natural respectfully requests that the schedule provide adequate time to review drafts ahead of the workshops and adequate time for providing comments. In addition, any workshop to discuss drafts should be scheduled with adequate preparation time. Please also see the Company's response to the next question.

- ***What other factors should I consider as I work to schedule workshops and comment deadlines?***

  Response
  NW Natural notes that there are several other rulemakings currently active or expected to be active soon, including AR 629, AR 669, AR 671, AR 676, AR 677, AR 678, AR 679 and UM 2405, that are all contemplating the finalization of rules within the next six months. All of these dockets require active participation on the part of many stakeholders, including utilities, community organizations, and Commission Staff. Care should be taken to schedule comments and workshops in consideration of the schedules of these other dockets as much as possible.

Conclusion
NW Natural appreciates the opportunity to provide these comments and looks forward to actively participating in this docket.

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

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

Respectfully submitted,

/s/ Eric W. Nelsen

Eric W. Nelsen (OSB# 192566)
NW Natural
Senior Regulatory Attorney
250 SW Taylor Street
Portland, OR 97204
Phone: (503) 610-7618
Email: eric.nelsen@nwnatural.com