NW Natural®

250 SW Taylor Street
Portland, OR 97204

503-226-4211
nwnatural.com

November 13, 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 Post-Workshop #1 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 18, 2025 in the above-referenced docket ("Memorandum").

The Company's comments address Workshop 1: Modules and Sequencing, held on October 27, 2025, by Administrative Law Judge ("ALJ") Mellgren. ALJ Mellgren's presentation, which is posted on the Commission's website, set the foundation for this rulemaking proceeding by reviewing this history of AR 641, summarizing the proposed modules, recalling the questions posed in the Memorandum issued on September 8, 2025, and the responsive comments made by interested stakeholders, and describing the proceeding's anticipated process and next steps.

During his presentation, ALJ Mellgren addressed a question posed by an interested stakeholder about the Attorney General's Model Rules for Administrative Procedure ("Model AG Rules"). In response to ALJ Mellgren's request, NW Natural will review the Model AG Rules in conjunction with the applicable module discussing the corresponding subset of the Commission's Division 001 rules. NW Natural recognizes the intent of this proceeding, as stated on page 1 of ALJ Mellgren's Memorandum issued on September 8, 2025, is to "improve our Division 001 rules and make them more relevant to modern practice before the Commission." In furtherance of this intent, interested stakeholders should be vigilant in considering whether adopting a Model AG Rule in place of a Commission Division 001 rule could have unintended consequences that undercut the efficient and effective practice and procedures before the Commission.

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