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December 22, 2011

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon
550 Capitol Street, N.E., Suite 215
P.O. Box 2148
Salem, Oregon 97308-2148

Attn: Filing Center

Re: **LC 51,** 2011 Modified Integrated Resource Plan
NW Natural's Reply Comments to Staff's Draft Recommendations and Draft Order

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company"), hereby submits its reply comments to Staff's Draft Recommendations and Draft Order filed December 8, 2011, in the subject docket.

A copy of this filing has been served to parties as indicated in the attached certificate of service.

If you have any questions, please contact Jennifer Gross at (503) 226-4211 extension 3590.

Sincerely,

*/s/ John Sohl*

John Sohl

Enclosure

cc: LC 51 Service List

Before the Public Utility Commission of Oregon
LC 51

| | |
|---|---|
| In the Matter of<br>NW Natural<br>2011 Integrated Resource Plan | NW Natural's Reply Comments to Staff's<br>Draft Recommendations<br>and Draft Order |

**Summary**

Northwest Natural Gas Company ("NW Natural" or "Company") files these comments in response to Staff's Draft Recommendations and Draft Order filed on December 8, 2011, in LC 51.

Staff presents two recommendations to the Commission in its filing: 1) that the Commission not acknowledge NW Natural's 2011 Modified Integrated Resource Plan ("IRP" or "Plan"), and 2) that the Commission direct NW Natural to revise its IRP and provide additional analysis within six months of the non-acknowledgement order. NW Natural disagrees with both recommendations.

NW Natural's 2011 Modified IRP complies with the guidelines established in Order Nos. 07-002 and 07-047 and, therefore, should be acknowledged. Moreover, requiring NW Natural to revise its 2011 IRP for a second time in an abbreviated timeframe would not be a useful path forward, even if the Commission agreed with Staff that further analysis should be done. Rather than continuing to work on a series of modifications to NW Natural's modified plan, the Commission should acknowledge the modified plan and allow the Company and Staff to begin a new two-year IRP cycle to update all of the inputs and to modify its future approach, as necessary.

NW Natural believes that nearly all of Staff's concerns are based on a misperception of what NW Natural is seeking to have accomplished through an acknowledgement of its modified IRP. In these comments, we clarify NW Natural's expectations of acknowledgment, provide a response to the technical arguments made by Staff, and also seek to correct certain statements made by Staff that we believe should be clarified for the record in this proceeding.

**Acknowledgement of the Company's 2011 Modified IRP**

<u>Background on the Process</u>
As summarized in the Company's reply comments filed on November 28, 2011, the process for this IRP began in January 2009. Four technical working group ("TWG") meetings with interested parties and one public meeting with customers were held to discuss the inputs and analysis of the IRP. The draft 2011 IRP was emailed to the TWG on October 22, 2010, discussed at the November 3, 2010 TWG meeting, and filed with the Commission on January 12, 2011.

Following this, the Company received requests from Staff and other parties to modify its IRP in light of changed circumstances, which included the withdrawal of a FERC application by Palomar Gas Transmission LLC to build the Palomar pipeline, which would bring gas supply from east of the Cascades. The 2011 Modified Plan was then developed with involvement of the TWG. The Company communicated with the TWG over email and held an additional TWG meeting in June 22, 2011. The 2011 Modified IRP was filed on September 1, 2011. Over this three year process, the Company has worked diligently and earnestly to develop a plan that complies with the guidelines established in Commission Order Nos. 07-002 and 07-047, and to be responsive to parties' suggestions and questions.

Appendix 1 of the Plan includes a point by point write up detailing how the Plan complies with the guidelines established for IRPs. However, Staff claims the Plan has "serious deficiencies . . . that result in non-compliance with several of the major requirements." (See Staff's Draft Order filed in LC 51, page 8.)

As stated above, Staff's concerns seem to be primarily based on a misperception of what result NW Natural is seeking to obtain through an acknowledgment of its modified IRP.

<u>Staff Concerns about the Preferred Portfolio</u>
Specifically, it appears that Staff believes that NW Natural is seeking for the Commission to give a final endorsement to NW Natural to include in its supply portfolio the proposed Palomar pipeline, which would increase the Company's access to gas supply east of the Cascades. Staff states, for example,

> Staff recommends the Commission not acknowledge the Company's modified 2011 IRP as filed. Further, Staff recommends the Commission direct NW Natural to perform a Benefit—Cost analysis of the revised Palomar/Blue Bridge project based on reliable estimates, in future IRPs . . . Until such time, there is not enough information to justify acknowledgement of the Company's preferred portfolio. (*Staff's Draft Recommendations*, p. 3.)

As explained below, NW Natural believes that Staff's concerns are misguided. NW Natural acknowledges that it does not currently have the information that would be required for the Commission to make a final determination that the Palomar project should be part of NW Natural's supply portfolio. And, NW Natural would not interpret an acknowledgement of its modified IRP as such a determination by the Commission.

As Staff correctly points out, the IRP contains substantial analysis and discussion around the need for a future cross-Cascades pipeline. However, the Company included this analysis and discussion *not* because it believes the Commission should approve the inclusion of such a pipeline at this time, but because the Company believes it is absolutely essential that the IRP provides the Commission useful insight into NW Natural's views on long-term resource needs, and that the IRP provide an avenue for a needed regional discussion about the need for supply from east of the Cascades. *See, e.g.* IRP. P. 3.15 ("From NW Natural's perspective, the primary benefit accruing from construction of Palomar/Blue Bridge would be to manage the risks associated with the delivery of natural gas into the region . . . [given that the] Willamette Valley, including the Portland metro area, is served solely by NWPL.").

The IRP clearly states that NW Natural is *not* seeking the Commission's approval of a portfolio that contains the pipeline. The IRP distinguishes between the "Base Case" that it has concluded addresses the forecasted gap in service (and which NW Natural asks the Commission to consider for purposes of acknowledgement), and a "planning path" that the Company believes should be discussed, and which it feels is preferred over a path without a cross-Cascades supply option. In short, the IRP describes a preferred "path" for the future, which NW Natural believes should be the subject of discussion in the region and with the Commission. The IRP states,

> A preferred *planning path* assumes that the proposed Palomar/Blue Bridge Pipeline is in service beginning in 2017 and additional pipeline capacity is then added to the system. . . . The resource decisions leading up to the year 2017 are identical for the Base Case and the preferred path. As a result, *no decision needs to be made right now as to which path to take*. Initial modeling and analysis has shown that a future which includes a new Cross-Cascades Pipeline such as the proposed Palomar/Blue Bridge project would increase both reliability and diversity of supply at an additional overall cost ranging from 0.3% to 0.6% over the Base Case.

Modified IRP, p. 1.3 (emphasis added).

Again, NW Natural included a discussion of a cross-Cascades pipeline in its modified IRP because it believes the option should be discussed, analyzed, and considered from a regional perspective. This approach in the modified IRP stands in contrast to NW Natural's initial 2011 IRP filing, which included a cross-Cascades pipeline in its preferred portfolio. For Staff to now suggest that the 2011 Modified IRP should not be acknowledged because it does not contain a robust enough analysis of such a pipeline would needlessly stifle a useful discussion with the Commission and among the parties in the region. It would also put the Company and other interested parties in a "chicken and egg" position, where an IRP discussion of a cross-Cascades pipeline could not be had until its plans were solid, and where such plans would be difficult to solidify because the discussion could not be had in the IRP process.

NW Natural believes it took an appropriate and careful approach in its modified IRP by presenting a <u>base case</u> under which NW Natural is projected to be able to meet its supply obligations, and a <u>planning path</u>, under which the Company proposes to continue to monitor the feasibility and desirability of a cross-Cascades pipeline, the details of which must of necessity be developed over time.

In considering Staff's recommendations, it appears that some of Staff's perceptions may have been caused by the wording in NW Natural's action items. Item 2.3 in the action plan states that NW Natural will "[s]upport development of the Palomar East Pipeline, primarily for risk management purposes in diversifying the Company's supply path options."[1] Staff complains, that NW Natural violates IRP Guideline 4(n),[2] stating that

> the Plan did not mention which specific and concrete activities it intends to take to acquire the Palomar/Blue Bridge resource. It appears that it relied on previously acknowledged IRP which this guideline indicates is not sufficient. (*Staff's Draft Recommendations – Draft Order*, p. 8)

As explained above, NW Natural did not intend for the Commission to acknowledge that the Palomar pipeline should be part of its portfolio in this proceeding. If the Commission desires further clarification of that point, the Company would be open to modifying its action items to be as follows:

> **2.3** Monitor developments of new pipeline developments in the region, such as the proposed Cross-Cascades Palomar/Blue Bridge Pipeline. As firm capacity rate estimates and service dates become available, integrate the estimates into the evolving Company resource model and evaluate proposed new pipelines in terms of diversity of supply, reliability and cost benefits for NW Natural customers.
>
> **4.2** Acquire resources consistent with the base case 1411-2011 IRP Mod Base Case. This plan is highlighted on page 5.30 and 5.31. The plan relies primarily on DSM and Mist Storage Recall in the near term.[3]

The Company believes its 2011 IRP and its 2011 Modified IRP meet the guidelines established in Commission Order Nos. 07-002 and 07-047, and therefore, the Company requests that the Commission acknowledge the Plan. If the discussion of a cross-Cascades pipeline in the plan raises concerns, the Company proposes that the Commission acknowledge the Company's Plan with the clarification that it is not making a final determination at this time that any specific cross-Cascades resource should be included in NW Natural's portfolio.

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[1] Modified IRP, p. 1.13.

[2] Guideline 4(n) provides that the plan must include: An Action plan with resource activities the utility intends to undertake over the next two to four years to acquire the identified resources, regardless of whether the activity was acknowledged in a previous IRP, with the key attributes of each resource specified as in the portfolio testing.

[3] The previous version of 4.2 contained language stating that in conjunction with its resource acquisitions, the Company would "Consider reserving capacity on a future Cross-Cascades Pipeline, such as the proposed Palomar/Blue Bridge project if one exists."

As Staff says in their draft recommendations:

> Staff notes that the Company's second candidate case (1411-2011 Mod Base Case) presents another less costly case on a Present Value Revenue Requirement (PVRR) presentation. Based on the information filed by NWN, there was no evidence to suggest that additional incremental resources will be needed in the near term, i.e. until the Company files its next IRP in two years. . (*Staff's Draft Recommendations*, p. 3.)

While NW Natural believes a cross-Cascades pipeline will provide customers with a greater diversity of supply and heightened reliability, the Company agrees that capacity on such a resource is not needed in the next two years. For this reason, there is no reason for the Commission to refuse to acknowledge NW Natural's IRP (which clearly presents a Base Case for serving load) simply due to the fact that the IRP contains discussion that Staff may believe is somehow premature.

**Responses to Staff's Technical Arguments**

As described above, NW Natural believes that Staff's concerns are primarily founded upon their assumption that NW Natural was seeking to gain a final determination that a cross-Cascades pipeline should be included in its portfolio. NW Natural is hopeful that the above discussion will alleviate those concerns. However, we are uncertain of whether Staff's position will persist, and therefore include a response to the technical arguments of Staff for the Commission's review.

Below are specific IRP guidelines that Staff says the Company's Plan does not meet. Following each guideline is Staff's statement explaining how they believe the Company did not comply. The Company's response then follows.

**Guideline 1(a)**
All resources must be evaluated on a consistent and comparable basis: Consistent assumptions and methods should be used for evaluation of all resources.

**Staff's Position**
*The Company did not apply consistent assumptions and methods to evaluate the Palomar/Blue Bridge pipeline.*

**Response**
The Company believes that Staff's concerns about Palomar/Blue Bridge being discussed in the IRP should be alleviated based on the above discussion. However, the Company points out that, for purposes of having as robust of a consideration of the project as possible at this stage,

it applied the same methods and assumptions for evaluating the proposed Palomar/Blue Bridge Pipeline as it applied to all other supply side resources.

As is discussed in the IRP, modeling is performed around current and future resources. Assumptions and estimates are developed for the future resource options to be evaluated, including DSM, reserved capacity on pipelines, pipeline construction, and storage facilities. For pipeline resources which are not built by NW Natural, such as the NWPL Grants Pass Lateral and Palomar/Blue Bridge, best estimates of available pipeline capacity, rates ($/MDTH) and service dates are input into the SENDOUT™ least cost planning model. Input demand requirements and commodity cost estimates are added, supply side and demand side resources are integrated, and the model is run. Resource planning is then evaluated based on balancing the risk of un–served demand while minimizing cost. Delving into the cost estimates and assumptions is part of the TWG review process.

When new estimates of rates and timelines for the proposed Palomar/Blue Bridge Pipeline Project became available after the 2011 IRP had been filed, the Company proposed a modification phase to the IRP. The capacity and connection points for the modeled pipeline resource remained the same.

Figures 5.1, 5.2 and 5.3 in the IRP display the modeled resources. A summary discussion of the resource model from the modification phase is included on pages 5.25 and 5.26 of the IRP. Appendix 3 of the IRP contains supply side resource cost estimates. Table 5.10 and Figure 5.14 provide an overview of the modeling results, and more detailed results are available in Appendix 5.

Contrary to Staff's claim, NW Natural did comply with Guideline (1)(a) by applying consistent assumptions and methods to evaluate the Palomar/Blue Bridge pipeline as it did to its other supply side options.

**Guideline 1(b)**
Risks and uncertainty must be considered. Utilities should identify in their plans any additional sources of risk and uncertainty.]

**Staff's Position**
*The Company did not identify the risks and uncertainties associated with the acquisition and development of the Palomar/Blue Bridge pipeline.*

**Response**
Again, Staff's concerns should be alleviated by the clarification that NW Natural is not seeking to have Palomar/Blue Bridge included in its portfolio in this IRP. However, in response to Staff's concerns, NW Natural clarifies that it did identify risks and uncertainties around the proposed Palomar/Blue Bridge pipeline. This was precisely the reason NW Natural agreed to embark on

the modification phase of the 2011 IRP. The risk of the pipeline project not being built was evaluated with numerous model runs. Uncertainty around pipeline rates was also evaluated by running both a low and high rate estimates in the model. Uncertainty around natural gas prices in light of an export LNG facility in British Columbia was also evaluated with and without the proposed pipeline project in the 2011 IRP. The following, from page 5.25 of the IRP, and Tables 5.9 and 5.10, present the resulting model runs:

> As a result of the uncertainty around Palomar that arose after the completion of the 2011 IRP, NW Natural embarked on a modification phase to the IRP. The modeling work for this phase took place between April and June of 2011. The results were presented and discussed at the June 22, 2011 Technical Working Group meeting. There were two primary purposes for the modification:
>
> 1. Further evaluate and analyze planning under assorted demand and natural gas price scenarios without a new Cross-Cascades pipeline such as Palomar/Blue Bridge as a resource option.
> 2. Evaluate planning with the proposed Palomar/Blue Bridge pipeline project as presented at the Natural Gas Pipeline Infrastructure Workshop, which included new estimations for pipeline rates and service dates. The modeled pipeline path and capacity is the same as in the original modeling phase for Palomar East.

As a result, 17 new model runs were completed, including 12 without Palomar/Blue Bridge. These model runs included an updated natural gas price forecast. The DSM and demand forecasts were left unchanged from the original modeling phase.

The model runs that were completed in the modification phase are listed in Table 5.9, along with the combination of inputs and assumptions. The risk that the Palomar/Blue Bridge pipeline project might not come to fruition was addressed in the modification since the majority of the model runs did not include Palomar/Blue Bridge in order to evaluate planning under various demand and pricing scenarios should the pipeline project not be built.

The Company asserts that it complied with Guideline 1(b) for the Palomar/Blue Bridge pipeline by including seventeen additional model runs, five of which included the risk of no Palomar/Blue Bridge project. These model runs sufficiently considered the risk and uncertainty that can be modeled at this time.

**Guideline 4(i)**
The plan must include: Evaluation of the performance of candidate portfolios over the range of identified risks and uncertainties.

**Staff's Position**
*The Company did not evaluate the performance of the Preferred Portfolio over the range of identified risks and uncertainties associated with the Palomar/Blue Bridge project.*

**Response**
NW Natural presented a Base Case (which does not include the Palomar/Blue Bridge project) for meeting its resource needs. However, for purposes of presenting a full picture of the Company's position on the need of a cross-Cascades pipeline, the Company did evaluate the performance of a future portfolio over a range of identified risks and uncertainties associated with a cross-Cascades pipeline.

Staff's claim of non-compliance is centered on the fact that NW Natural did not perform Monte Carlo simulations on the additional portfolios included in the Modified Plan. As stated in the Company's response to Data Request No. 39, Monte Carlo simulations were run on the portfolios included in the 2011 IRP filed January 12, 2011. The Modified Plan included the portfolios with the same supply side resources. Only the rate and service date assumptions regarding Palomar changed. As far as the model is concerned, the capacity attributes of the Palomar pipeline remain the same between original and modification phases. As such, the ability to meet customer demand is no different for the portfolios included in the 2011 IRP as the 2011 Modified IRP. It is unlikely that performing a redundancy of Monte Carlo simulations would provide any useful information. And, it would take substantial additional time that would needlessly require the IRP process to be drawn out even longer than it has.

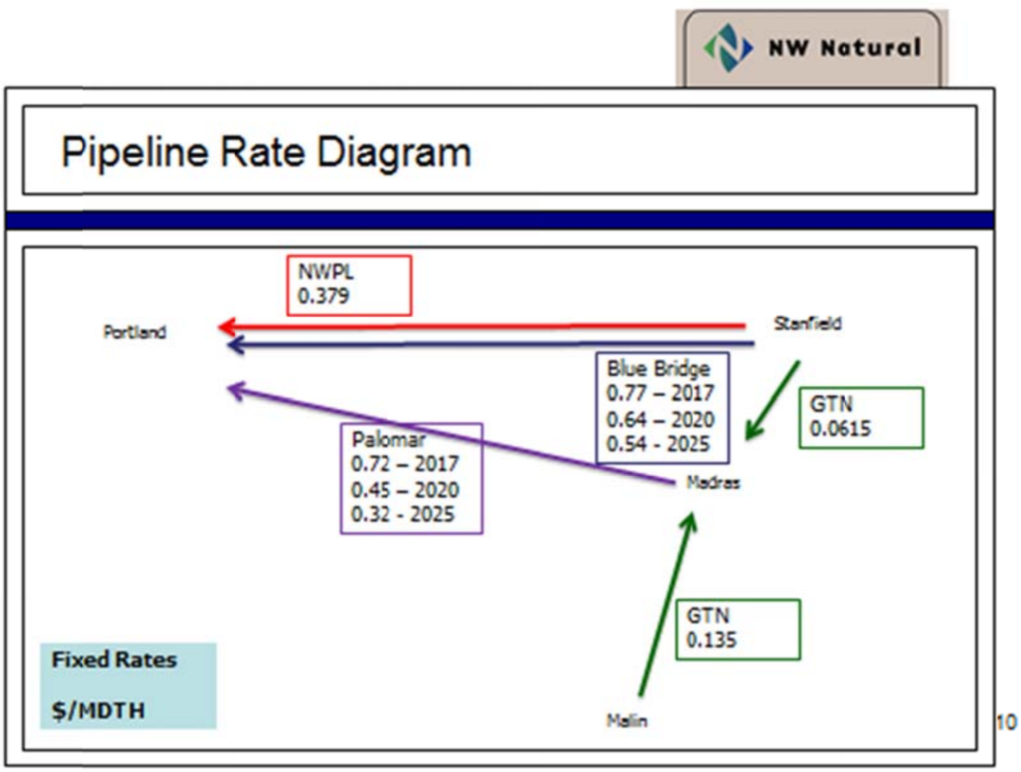
Again, since the physical capacity of the resource options did not change, the risks associated with un-served demand were assessed in the initial Monte Carlo analysis. Risks pertaining to the completion of the Palomar/Blue Bridge project were also addressed in the numerous model runs that did not include Palomar/Blue Bridge in order to evaluate planning under various demand and pricing scenarios should the pipeline project not be built.

NW Natural points out again that the Company has been engaged in this IRP process for three years, and in the modification process since early this year, and that it has readily responded to formal and informal data requests. Nowhere in that process did Staff, or any other party, request that NW Natural perform additional Monte Carlo analysis, until November 28th, when Staff filed its comments. *See* page 2 of Staff's Draft Recommendations. As mentioned in its reply comments filed December 8, 2011, the Company requested feedback on its proposed analysis for the Modified IRP and received no request for Monte Carlo modeling either through email communications or at the June 22, 2011 TWG meeting. The Company first learned that Staff wanted additional Monte Carlo simulations from Staff's Comments that were filed on November 28, 2011. It would undermine the TWG process if NW Natural's IRP is not acknowledged because it did not conduct an analysis (with limited or no usefulness) that was not requested by anyone during the creation of the Plan, despite requests for feedback by the Company on its proposal to not include such analysis.

**Guideline 4(e)**
The plan must include: Identification and estimated costs of all supply-side and demand-side resource options, taking into account anticipated advances in technology.

**Staff's Position**
*The Company failed to provide a reliable and reasonable estimate of costs of the Palomar/Blue Bridge project.*

**Response**
In the initial 2011 IRP, costs for reserving capacity on the Palomar/Blue Bridge project were based on a precedent agreement between NW Natural and Palomar Gas Transmission ("PGT"). When PGT withdrew its certificate application with the Federal Energy Regulatory Commission ("FERC"), the cost assumptions from that agreement needed to be re-visited. Costs for capacity on the un-built pipeline were forecasted using educated assumptions that were explained at the June 22, 2011 TWG meeting. The following slide was presented and discussed:




As was pointed out in the IRP, as well as the during TWG meeting, the rate estimates for capacity on the propose pipeline were based on information presented at the February 2011 public workshop to discuss natural gas infrastructure jointly sponsored by the Public Utility Commission of Oregon and the Washington Utility and Transportation Commission.

The cost assumptions were well discussed at the TWG meeting and questions were welcomed. These cost estimates were and remain the best available (i.e., most reliable and reasonable) for the Palomar/Blue Bridge pipeline at this early planning stage of the proposed resource. Staff has not provided better information or shown why NW Natural's reliance on this information is not appropriate. Conceptually, the Palomar/Blue Bridge pipeline is and should be treated identically to other possible future resources, such as expansions on the Northwest Pipeline, for which no specific cost data exists and so must rely on reasonable assumptions and estimates, which are vetted during the IRP review process.

**Guideline 4(f)**
The plan must include: Analysis of measures the utility intends to take to provide reliable service including cost-risk trade-offs.

**Staff's Position**
*The Company did not include cost-risk tradeoff for the Palomar/Blue Bridge project.*

**Response**
Chapter 3 of the Plan discusses NW Natural's Gas Supply Risk Management Policies, modeling tools, and cost/risk considerations for the basis for planning and maintaining reliable gas service. The cost and risk tradeoff is also summarized in the Key Findings section in Chapter 5. Palomar/Blue Bridge would open up supply diversity options, and it would result in higher overall system costs (0.3% to 0.6% higher) as compared to the base case plan 1411. This analysis complies with Guideline 4(f).

**Guideline 4(j)**
The plan must include the result of testing and rank ordering of the portfolios by cost and risk metric and interpretation of those results.

**Staff's Position**
*Notwithstanding the previous findings, the Company did not identify which risk metric, if any, it used in order to compare the performance of these portfolios. [Guideline 4(j)]*

**Response**
Tables 5.9 and 5.10 of the IRP summarize the resource portfolio evaluations from the modification phase. Additional detailed results for the scenarios are available in Appendix 5. These results represent the least cost, risk adjusted plan for meeting given demand requirements. The two primary areas of risk include the physical risk of un-served demand, and the financial risk due to unreasonably high resource costs to serve demand. The Company developed numerous scenarios for future demand by varying customer growth and usage

patterns. These demand scenarios are displayed in Figure 2.17 and Figure 2.18 of the IRP. In addition, scenarios with varying demand side management savings, gas supply prices, and resource options were evaluated. These scenarios are listed in Table 2.10 of the IRP. These scenarios were run though the Company's SENDOUT™ planning model which determines cost effective and risk-adjusted resource mixes.

**Staff's Recommendation that the Company Modify its Plan in 6 Months**

Besides recommending that the Commission not acknowledge the Company's Plan, Staff further recommends that the Company perform additional analysis to its plan within a six month period. The Company strongly opposes this suggestion. As mentioned, the process for the current plan has extended three years. The Plan was modified after it was filed in January of 2011. The original assumptions continue to age. While gas prices were updated in the 2011 Modified IRP, other inputs were not such as load forecasts, avoided costs, and the DSM technical potential. Continuing to patch an aging IRP will not provide useful results and is not the best path forward. The Company would much prefer to start a new, full two-year IRP cycle that would allow for all inputs to be updated and would further allow parties to discuss or request modifications to specific analytical approaches such as the design weather year.

As part of the additional analysis that Staff believes is necessary, Staff would like the Company to study the impact straight fixed variable ("SFV") rates would have on its demand side management potential. This suggestion was initially made by Citizens' Utility Board ("CUB") in their comments filed on November 14, 2011. The Company responded to this suggestion in its Reply Comments filed on November 28, 2011, by saying the following:

> To date, the Company has not filed for SFV rates nor had it finalized a rate design proposal for its upcoming rate case when the IRP analysis was being conducted. The appropriate forum for a discussion of potential new rate design proposals is when those proposals are made. An analysis of an unfiled and unapproved rate design in our IRP would have been inappropriate, and would have vaulted a discussion of rate design into the IRP process rather than in a rate case, where the details and impacts of such a proposal should be considered and are, in fact, determined.
>
> Further, other aspects of the Company's current rate design, such as its weather normalization or decoupling mechanisms were never modeled in the IRP, nor should they have been, as the IRP is a long term resource plan, not a document for determining an appropriate rate design. (page 3)

Further, retail rate design does not change a utility's avoided cost and, therefore, does not change the technical potential for DSM. Additionally, even if the assumption could be made that the acquisition of therm savings were more difficult with SFV from a societal perspective, the greatest impact would be a mere fraction of one percent since DSM represents approximately 1% of the resource plan. NW Natural does not believe that retail rate design should be discussed in its IRP, especially not at a point when no proposal (let alone a decision on such a proposal) exists.

**Mischaracterization of NW Natural's Ownership in Palomar**

NW Natural is concerned about a mischaracterization presented in Staff's Draft Recommendation and Draft Order and addresses it here. Staff makes repeated statements that NW Natural is the owner of Palomar. Palomar is a wholly-owned subsidiary of Palomar Gas Holdings of which NW Natural owns 50% and TransCanada owns 50%. (*See* NW Natural 10-Q for the period ending September 30, 2011, page 25). Additionally, a Memorandum of Understanding announced over a year ago with Williams Northwest Pipeline means that NW Natural now is only one of three sponsors examining the development of a future cross-Cascades pipeline project.

**Conclusion**

The Company's 2011 Modified IRP complies with the guidelines established for IRPs and NW Natural requests that the Commission acknowledge its Plan as filed. In the future, the Company looks forward to beginning a new, full two-year IRP study wherein parties, including Staff, may participate, and through which further information may be developed that Staff will find useful and necessary.

**CERTIFICATE OF SERVICE**

I certify that I have this day served the foregoing NW NATURAL'S REPLY COMMENTS upon all parties of record in this proceeding (LC 51), by e-mailing an electronic copy to the following parties or attorneys of parties:

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DATED at Portland, Oregon, this 22nd of December 2011.

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