LAUREN RICHARDS
Main (503) 595-3922
lauren@mrg-law.com

July 31, 2024

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket UG 490 – In the Matter of Northwest Natural Gas Company, dba NW Natural, Application for a General Rate Revision.

Attention Filing Center:

Attached for filing in the above-referenced docket, please find NW Natural's Amended Cross-Examination Statement and Cross-Examination Exhibit.

Please contact this office with any questions.

Sincerely,

Lauren Richards

Lauren Richards
Legal Assistant
McDowell Rackner Gibson PC

Attachment

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UG 490

In the Matter of NORTHWEST NATURAL GAS COMPANY, dba NW Natural, Application for a General Rate Revision.	**NORTHWEST NATURAL GAS COMPANY'S AMENDED CROSS-EXAMINATION STATEMENT AND CROSS-EXAMINATION EHXIBIT**

In accordance with Administrative Law Judge (ALJ) Sarah Spruce's February 5, 2024 Prehearing Conference Memorandum and July 16, 2024 Memorandum on Hearing Procedures, Northwest Natural Gas Company dba NW Natural submits its Amended Cross-Examination Statement and Cross-Examination Exhibit to the Public Utility Commission of Oregon.

NW Natural plans to cross-examine the following witnesses regarding non-confidential materials:

Witness (Party)	Estimate	Questioning Counsel	Subject Matter
Eric Shierman and Curtis Dlouhy (Staff)	40 minutes	Jocelyn Pease	New Premises Customer Charge Rate Design

Staff amended Staff/4100 to add Dr. Dlouhy as a witness after NW Natural initially filed its cross-examination statement, and the Company is adding Dr. Dlouhy to this amended statement for clarity.

In addition, NW Natural submits the following cross-examination exhibit for inclusion in the administrative record.

Exhibit Name	Exhibit Number	Witness	Subject Matter
Staff's 2nd Amended Response to NW Natural DR 33	5100	Staff stipulated to admission	Political Activities

This Exhibit is an amended data response that was received after NW Natural initially filed its cross-examination statement. The Exhibit is attached to this filing.

Respectfully submitted this July 31, 2024.

Jordan Schoonover
Jocelyn Pease
McDowell Rackner Gibson PC
419 SW 11th Ave., Suite 400
Portland, OR 97205
Phone: (503) 290-3620
Phone: (503) 290-3633
Email: jordan@mrg-law.com
jocelyn@mrg-law.com

Attorneys for Northwest Natural Gas Company dba NW Natural

BEFORE THE

PUBLIC UTILITY COMMISSION OF OREGON

UG 490

NW Natural

Staff's 2nd Amended Response to NW Natural Data Request No.33

EXHIBIT 5100

July 31, 2024

Date: July 31, 2024

TO:

Eric Nelsen
Northwest Natural Gas
220 NW Second Avenue
Portland, OR 97209

Lisa Rackner or Jocelyn Pease
McDowell, Rackner & Gibson
419 SW Eleventh Ave., Suite 400
Portland, OR 97205
jocelyn@mrg-law.com

FROM: Paul Rossow
Utility Analyst
Rates Division

OREGON PUBLIC UTILITY COMMISSION
Docket No. UG 490 – NWN Data Request No. 33

Data Request No. 33:
Please reference Staff/4000, Rossow/5, Lines 9-15. What is the purpose of Staff's recommendation? Is Staff's intention that NW Natural charge exception time for employee time spent working on matters before all of the bodies listed, and specifically executive agencies? If that is Staff's intention, please confirm that such intention is to apply such exception time reporting equally to all public utilities in Oregon. If not confirmed, please explain why not.

Staff Second Amended Response No 33:
Staff's reason for proposing to add the specific language to NW Natural's General Procedure is to provide an improved level of transparency when NW Natural is engaging in lobbying activities with local governments, government officials and State Agencies that are political, informational, or educational. In the materials Staff reviewed, NWN often identified the local government or administrative agency when reporting lobbying activity, but not always. Staff does not intend for the reporting requirement to apply to all matters before "judicial, executive, or Department of Environmental Quality, Department of Energy, Treasury, school boards, housing authorities, sewer and water districts, and zoning boards, whether elected or appointed." Staff intends that political activities for which NWN would report exception time would include engaging with government officials or representatives of the government officials regarding a change to a state statute, City Code or County Code or the appointment of a new state or local government official.

Staff does not intend for this requirement to apply to regulatory activities. Staff is not sure about whether it will pursue a policy that applies uniformly to all utilities because Staff has not yet investigated to determine whether spending on lobbying local governments is a concern that applies to all utilities in Oregon, or whether this issue is more narrowly applicable to NWN's efforts to persuade local governments and other entities to not regulate use of natural gas.