

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UG 344

In the Matter of
NORTHWEST NATURAL GAS
COMPANY, dba NW NATURAL
Request for a General Rate Revision.

STAFF'S MOTION TO ADMIT
PRE-FILED EXHIBITS

Staff of the Public Utility Commission of Oregon ("Staff") moves to admit the following exhibits pre-filed in this docket into the record in the above-captioned case:

Exhibit 100	Testimony of Marianne Gardner
Exhibit 101	Witness Qualification Statement of Marianne Gardner
Exhibit 102	NWN responses to Staff data requests
Exhibit 103	Escalation – Excerpts
Exhibit 104	FERC Notice
Exhibit 105	Staff outstanding data requests to NWN
Exhibit 106	NWN responses to NWIGU data requests
Exhibit 200	Testimony of Matt Muldoon
Exhibit 201	Witness qualification statement of Matt Muldoon
Exhibit 202	Staff Peer Screening
Exhibit 203	Staff Three-Stage DCF Modeling
Exhibit 204	Treasury Inflation Protected Securities (TIPS) Analysis
Exhibit 205	Referent Long-Run 10-30 GDP Growth Rates
Exhibit 206	Long-Run Real GDP Growth Rates with BEA Data
Exhibit 207	Staff Simple Single-Stage DCF Model
Exhibit 208	Cost of LT Debt Table & Maturity Profile (Confidential)
Exhibit 209	NW Natural Investor Presentation
Exhibit 210	Value Line (VL) Natural Gas Utility Data Profiles
Exhibit 211	News that Investors are Seeing
Exhibit 212	Staff CAPM Modeling
Exhibit 300	Testimony of John Fox
Exhibit 301	Witness Qualification Statement of John Fox
Exhibit 302	Proposed Gross Plant Adjustments
Exhibit 303	Major Project List
Exhibit 304	Distribution Expense Adjustment
Exhibit 305	Construction Overhead Adjustment (Confidential)
Exhibit 306	Stock Based Compensation
Exhibit 307	Pension Expense
Exhibit 308	Other Post Retirement Benefits Expense
Exhibit 309	Data Request Responses

1	Exhibit 400	Testimony of Rose Anderson
2	Exhibit 401	Witness Qualification Statement of Rose Anderson
3	Exhibit 402	Budgeted and Actual Category "A" Advertising Expenditures
4	Exhibit 403	Examples of Environmental Advertising
5	Exhibit 404	NW Natural Responses to Staff Discovery Regarding Renewable Natural Gas
6	Exhibit 405	NW Natural Promotional Concessions Filings in Docket No. RG 31
7	Exhibit 406	NW Natural Response to Staff DR 244: Company Explanation of Miscellaneous Revenue Accounting Data
8	Exhibit 407	NW Natural Response to Staff DR 243: Company Explanation of Carbon Savings Goal
9	Exhibit 500	Testimony of Phil Boyle
10	Exhibit 501	Witness Qualification Statement of Phil Boyle
11	Exhibit 502	Graph of NW historic fee free bankcard transactions plus NWN's 2018 through end of test year projected transactions
12	Exhibit 503	Tables showing NWN projected transactions and Staff projected transactions
13	Exhibit 504	Graph of NWN historic fee free bankcard transactions plus Staff's 2018 through end of test year projected transactions following trend
14	Exhibit 505	Graph showing historical fee free bankcard payment adoption rates
15	Exhibit 506	Graph of NWN historic fee free bankcard transactions plus Staff's 2018 through end of test year projected transactions reflecting cap of 22 percent adoption rate in test year
16	Exhibit 507	NWN Response to Staff DR 179
17	Exhibit 508	NWN Response to Staff DR 376
18	Exhibit 600	Testimony of Scott Gibbens
19	Exhibit 601	Witness Qualification Statement for Scott Gibbens
20	Exhibit 602	Workpapers supporting D&O adjustment
21	Exhibit 603	Workpapers supporting medical benefits expense adjustment
22	Exhibit 604	2017 Benchmarking Study by Towers & Watson
23	Exhibit 700	Testimony of Lance Kaufman
24	Exhibit 701	Witness Qualification Statement of Lance Kaufman
25	Exhibit 702	Data Request Responses
26	Exhibit 703	Data Request Responses (Confidential)
	Exhibit 704	MWVF Alternatives Cost
	Exhibit 705	Capital Spending Summary
	Exhibit 706	Woodburn Public Works
	Exhibit 707	Non-Bare Steel Replacement
	Exhibit 708	Business Services Operating Ratio
	Exhibit 709	Officer Non-Utility Time
	Exhibit 710	Insurance Allocations
	Exhibit 711	Pages from nwnatural.com
	Exhibit 713	Geo-Engineer Article on MWVF
	Exhibit 714	Non-Utility O&M Costs
	Exhibit 715	Staff Revenue Forecasts
	Exhibit 800	Testimony of Mitchell Moore

1	Exhibit 801	Witness Qualification Statement of Mitchell Moore
2	Exhibit 900	Testimony of Paul Rossow
3	Exhibit 901	Witness Qualification Statement of Paul Rossow
4	Exhibit 902	Workpaper in support of adjustment
5	Exhibit 1000	Testimony of Kathy Zarate
6	Exhibit 1001	Witness Qualification Statement of Kathy Zarate
7	Exhibit 1002	NWN response to Staff Data Request No. 57
8	Exhibit 1003	Company response to Staff Data Request Nos. 133-135
9	Exhibit 1100	Testimony of Ming Peng
10	Exhibit 1101	Witness Qualification Statement of Ming Peng
11	Exhibit 1200	Testimony of George Compton
12	Exhibit 1201	Witness Qualification Statement of George Compton
13	Exhibit 1202	Staff alternative to Company's LRIC Study
14	Exhibit 1203	Mains costs
15	Exhibit 1300	Testimony of Deborah Glosser
16	Exhibit 1301	Witness Qualification Statement of Deborah Glosser
17	Exhibit 1400	Rebuttal and Cross-Answering Testimony of Marianne Gardner
18	Exhibit 1401	"Comments of the Edison Electric Institute"
19	Exhibit 1402	Excess ADIT Timing Example.xlsx
20	Exhibit 1403	Proposed Amortization of Excess Deferred Income Taxes
21	Exhibit 1500	Rebuttal and Cross-Answering Testimony of Marianne Gardner
22	Exhibit 1600	Rebuttal and Cross-Answering Testimony of Deborah Glosser

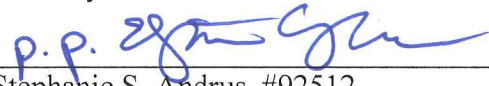
23 The testimony and witness qualification statements of Staff witnesses are supported by
 24 declarations of the witnesses attesting to the truthfulness of their statements. Staff witness Scott
 25 Gibbens has adopted the testimony of Lance Kaufman, who is no longer employed by the
 26 Commission, and attests to the truthfulness of Mr. Kaufman's testimony.

27 The declarations of Marianne Gardner, Matt Muldoon, John Fox, Phil Boyle, Mitchell
 28 Moore, Scott Gibbens, Ming Peng, Kathy Zarate, Paul Rossow and Rose Anderson are attached
 29 to this motion. The declarations of Deborah Glosser and George Compton will be filed
 30 separately.

31 DATED this 18th day of October 2018.

32 Respectfully submitted,

33 ELLEN F. ROSENBLUM
 34 Attorney General

35 
 36 Stephanie S. Andrus, #92512
 Senior Assistant Attorney General
 Of Attorneys for Staff of the Public Utility
 Commission of Oregon

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UG 344**

4 In the Matter of)
5 NORTHWEST NATURAL GAS COMPANY) DECLARATION OF
6 Request for a General Rate Revision) MARIANNE GARDNER
7 _____)

8 I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon:
9

10 1. I am the Program Manager for Rate Cases and Audits employed in the Energy
11 Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

12 2. On behalf of Staff of the Public Utility Commission, I drafted testimony for the
13 above-captioned docket pre-filed as Staff Exhibit 100 and 1400, and drafted my witness
14 qualification statement pre-filed as Staff Exhibit 101.

15 3. On behalf of Stipulating Parties, I co-drafted Joint Testimony in support of the All-
16 Party Stipulation and Second Stipulation pre-filed as Stipulating Parties Exhibits 100 and 200.

17 3. To the best of my knowledge, my pre-filed testimony and witness qualification
18 statement are true and accurate.

19 I hereby declare that the above statement is true to the best of my knowledge and
20 belief, and that I understand it is made for use as evidence in court and is subject to
21 penalty for perjury.

22 SIGNED this 16 day of October 2018.

23 
24 _____
25 MARIANNE GARDNER
26

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 344

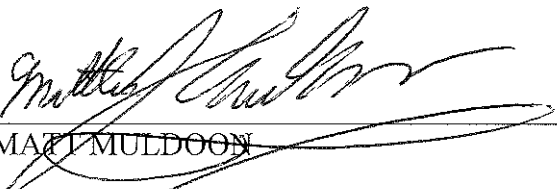
In the Matter of)	
)	
NORTHWEST NATURAL GAS COMPANY)	DECLARATION OF
)	MATT MULDOON
Request for a General Rate Revision.)	
_____)	

I, Matt Muldoon, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist for the Public Utility Commission of Oregon.
2. On behalf of Staff of the Public Utility Commission, I drafted testimony for the above-captioned docket pre-filed as Staff Exhibit 200, and my witness qualification statement pre-filed as Staff Exhibit 201.
3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of October 2018.



MATT MULDOON

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 344

In the Matter of)	
)	
NORTHWEST NATURAL GAS COMPANY)	DECLARATION OF
)	JOHN FOX
Request for a General Rate Revision)	
_____)	

I, John Fox, state the following, under penalty of perjury in the State of Oregon:

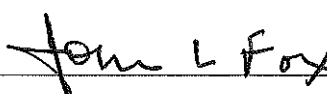
1. I am a Senior Financial Analyst, in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for the above-captioned docket pre-filed as Staff Exhibit 300, my witness qualification statement, pre-filed as Staff Exhibit 301, and reply testimony pre-filed as Staff Exhibit 1500.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 12th day of October 2018.



 John Fox

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 344

In the Matter of)	
)	
NORTHWEST NATURAL GAS COMPANY)	DECLARATION OF
)	PHIL BOYLE
Request for a General Rate Revision)	
_____)	

I, Phil Boyle, state the following, under penalty of perjury in the State of Oregon:

1. I am the Consumer Services Manager employed by the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for the above-captioned docket pre-filed as Staff Exhibit 500, and my witness qualification statement pre-filed as Staff Exhibit 501.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15 day of October 2018.



 PHIL BOYLE

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UG 344**

4 In the Matter of)
5 NORTHWEST NATURAL GAS COMPANY) DECLARATION OF
6 Request for a General Rate Revision.) MITCHELL MOORE
7 _____)

8 I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Utility Analyst in the Energy Rates, Finance and Audit Division of
10 the Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony
12 for the above-captioned docket pre-filed as Staff Exhibit 800, and my witness qualification
13 statement, pre-filed as Staff Exhibit 801.

14 3. To the best of my knowledge, my pre-filed testimony and witness qualification
15 statement are true and accurate.

16
17 I hereby declare that the above statement is true to the best of my knowledge and
18 belief, and that I understand it is made for use as evidence in court and is subject to
19 penalty for perjury.

20 SIGNED this 15 day of October 2018.

21 
22 _____
23 MITCHELL MOORE

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 344

In the Matter of)	
)	
NORTHWEST NATURAL GAS COMPANY)	DECLARATION OF
)	SCOTT GIBBENS
Request for a General Rate Revision)	
_____)	

I, Scott Gibbens, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist employed in the Energy Rates, Finance and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted testimony for the above-captioned docket pre-filed as Staff Exhibit 600, and my witness qualification statement, pre-filed as Staff Exhibit 601.

3. On behalf of Staff, I adopt the testimony of former Staff employee Lance Kaufman pre-filed as Staff Exhibit 700.

To the best of my knowledge, my pre-filed testimony, including adopted testimony, and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of October 2018.



SCOTT GIBBENS

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 344

In the Matter of)	
)	
NORTHWEST NATURAL GAS COMPANY)	DECLARATION OF
)	MING PENG
Request for a General Rate Revision.)	
_____)	

I, Ming Peng, state the following, under penalty of perjury in the State of Oregon:

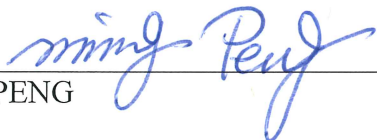
1. I am a Senior Economist employed in the Energy Rates, Finance, and Audit Division of the Public Utility Commission of Oregon.

2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony for the above-captioned docket pre-filed as Staff Exhibit 1100, and my witness qualification statement, pre-filed as Staff Exhibit 1101.

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15 day of October 2018.



 MING PENG

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UG 344**

4 In the Matter of)
5 NORTHWEST NATURAL GAS COMPANY) DECLARATION OF
6 Request for a General Rate Revision.) KATHY ZARATE
7 _____)

8 I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Utility Economist employed in the Energy Rates, Finance, and Audit
10 Division of the Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony
12 for the above-captioned docket pre-filed as Staff Exhibit 1000, and my witness qualification
13 statement, pre-filed as Staff Exhibit 1001.

14 3. To the best of my knowledge, my pre-filed testimony and witness qualification
15 statement are true and accurate.

16
17 I hereby declare that the above statement is true to the best of my knowledge and
18 belief, and that I understand it is made for use as evidence in court and is subject to
19 penalty for perjury.

20 SIGNED this 15 day of October 2018.

21 _____
22 KATHY ZARATE
23
24
25
26

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UG 344**

4 In the Matter of)
5 NORTHWEST NATURAL GAS COMPANY) **DECLARATION OF**
6 Request for a General Rate Revision.) **PAUL ROSSOW**
7 _____)

8 I, Paul Rossow, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Utility Analyst in the Energy Resources and Planning Division of the
10 Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony
12 for the above-captioned docket pre-filed as Staff Exhibit 900, and my witness qualification
13 statement, pre-filed as Staff Exhibit 901.

14 3. To the best of my knowledge, my pre-filed testimony and witness qualification
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and
17 belief, and that I understand it is made for use as evidence in court and is subject to
18 penalty for perjury.

19 SIGNED this 18 day of October 2018.

20
21 *Paul Rossow*
22 _____
23 PAUL ROSSOW
24
25
26

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UG 344**

4 In the Matter of)
5 NORTHWEST NATURAL GAS COMPANY) **DECLARATION OF**
6 Request for a General Rate Revision.) **ROSE ANDERSON**
7 _____)

8 I, Rose Anderson, state the following, under penalty of perjury in the State of Oregon:

9 1. I am a Senior Utility Analyst in the Energy Resources and Planning Division of
10 the Public Utility Commission of Oregon.

11 2. On behalf of Staff of the Public Utility Commission, I drafted opening testimony
12 for the above-captioned docket pre-filed as Staff Exhibit 400, and my witness qualification
13 statement, pre-filed as Staff Exhibit 401.

14 3. To the best of my knowledge, my pre-filed testimony and witness qualification
15 statement are true and accurate.

16 I hereby declare that the above statement is true to the best of my knowledge and
17 belief, and that I understand it is made for use as evidence in court and is subject to
18 penalty for perjury.

19 SIGNED this 18th day of October 2018.

21 
22 _____
23 ROSE ANDERSON