



# Oregon Citizens' Utility Board

610 SW Broadway, Suite 400  
Portland, OR 97205

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[www.oregoncub.org](http://www.oregoncub.org)

October 5, 2022

Public Utility Commission  
Attn: Filing Center  
P.O. Box 1088  
Salem, OR 97308-1088

**Re: UG 435 – In the Matter of NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL, Request for a General Rate Revision.**

Dear Filing Center:

The Oregon Citizens' Utility Board (CUB) files herewith a correction to its UG 435 *Motion to Admit Prefiled Exhibits* and Declarations in support. Witness Declarations from Bob Jenks and William Gehrke have been updated to include testimony from stipulating parties co-sponsored by CUB.

The motion and declarations attached here reflect these changes. CUB respectfully requests that this updated testimony be filed on the Public Utility Commission of Oregon's eDockets website.

CUB apologizes for any inconvenience. Please contact me if you have any questions with this filing.

Sincerely,

A handwritten signature in blue ink that reads "Michael P. Goetz". The signature is stylized and cursive.

Michael P. Goetz, OSB #141465  
General Counsel  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. [mike@oregoncub.org](mailto:mike@oregoncub.org)

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 435**

In the Matter of	)	
	)	
NORTHWEST NATURAL GAS COMPANY,	)	OREGON CITIZENS' UTILITY
dba NW NATURAL,	)	BOARD'S MOTION TO ADMIT PRE-
	)	FILED TESTIMONY AND EXHIBITS
Request for a General Rate Revision (UG 435),	)	
	)	
Advice No. 20-19, Schedule 198 Renewable	)	
Natural Gas Recovery Mechanism (ADV 1215)	)	
(UG 411).	)	

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Pursuant to OAR 860-001-0420, the Oregon Citizens' Utility Board ("CUB") moves for admission of the following pre-filed testimony and exhibits into the record in the above-captioned proceeding:

- CUB's Opening Testimony and Exhibits of Bob Jenks (CUB/100-127, Jenks); William Gehrke (CUB/200-213, Gehrke); Sudeshna Pal (CUB/300-301, Pal);
  
- CUB's Second Errata to Rebuttal and Cross Answering Testimony and Exhibits of Bob Jenks and William Gehrke, (CUB/400-406, Jenks), (CUB/500-502, Gehrke);
  
- CUB's Exhibits for Inclusion in the Administrative Record (CUB/600-616);

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The above-referenced testimony and exhibits were previously filed with the Commission and represent CUB's contribution to the record in this docket. Witness declarations attesting to the truthfulness of this testimony is attached herewith.

Dated this 20<sup>th</sup> day of September, 2022.

A handwritten signature in blue ink, appearing to read "Michael P. Goetz".

Michael P. Goetz, OSB #141465  
General Counsel  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. [mike@oregoncub.org](mailto:mike@oregoncub.org)

**BEFORE THE PUBLIC UTILITY COMMISSION**  
**OF OREGON**  
**UG 435**

In the Matter of )  
)  
NORTHWEST NATURAL GAS COMPANY, ) DECLARATION OF BOB JENKS  
dba NW NATURAL, )  
)  
Request for a General Rate Revision (UG 435), )  
)  
Advice No. 20-19, Schedule 198 Renewable Natural  
Gas Recovery Mechanism (ADV 1215) (UG 411).

I, Bob Jenks, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Bob Jenks. I am the Executive Director of the Oregon Citizens' Utility Board (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205;
2. I sponsored pre-filed CUB's Opening Testimony and Exhibits of Bob Jenks (CUB/100-127, Jenks) on behalf of CUB;
3. I co-sponsored pre-filed CUB's Second Errata to Rebuttal and Cross Answering Testimony and Exhibits of Bob Jenks and William Gehrke (CUB/400-406, Jenks);
4. I co-sponsored on behalf of CUB Stipulating Parties Reply Testimony to SBUAs Objections to the Second Stipulation (NW Natural-Staff-CUB-AWEC-Coalition/200, Kravitz, Wyman, Fjeldheim, Scala, Jenks, Mullins, and Fain).
5. I co-sponsored on behalf of CUB Stipulating Parties' Joint Testimony in Support of Second Partial Stipulation (Stipulating Parties/100, Kravitz, Wyman, Fjeldheim, Scala, Jenks, Mullins, and Fain);
6. My Testimony and Exhibits previously filed are true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

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I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

Signed this 5th day of October, 2022

A handwritten signature in black ink, appearing to read "Bob Jenks", written in a cursive style.

Bob Jenks  
Executive Director  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. bob@oregoncub.org

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 435**

In the Matter of	)	
	)	
NORTHWEST NATURAL GAS COMPANY,	)	DECLARATION OF WILLIAM GEHRKE
dba NW NATURAL,	)	
	)	
Request for a General Rate Revision (UG 435),	)	
	)	
Advice No. 20-19, Schedule 198 Renewable Natural	)	
<u>Gas Recovery Mechanism (ADV 1215) (UG 411).</u>	)	

I, William Gehrke, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is William Gehrke. I am a senior economist for the Oregon Citizens' Utility Board (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205;
2. I sponsored pre-filed CUB's Opening Testimony and Exhibits of William Gehrke(CUB/200-213, Gehrke) on behalf of CUB;
3. I co-sponsored CUB's Second Errata to Rebuttal Testimony of Bob Jenks and William Gehrke (CUB/500-502, Gehrke) on behalf of CUB;
4. I co-sponsored pre-filed Stipulating Parties' Joint Testimony in Support of the Stipulation of Zachary D. Kravitz, Brian Fjeldheim, William Gehrke, Bradley Mullins, and Danny Kermode (NW Natural-Staff-CUB-AWEC-SBUA/100);
5. I co-sponsored pre-filed Stipulating Parties' Joint Reply Testimony to the Coalition's Objections to the First Stipulation of Zachary D. Kravitz, Brian Fjeldheim, William Gehrke, Bradley Mullins, and Danny Kermode (NW NATURAL-STAFF-CUB-AWEC-SBUA EXHIBIT 200/Kravitz, Fjeldheim, Gehrke, Mullins, Kermode).
6. My Testimony and Exhibits previously filed are true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

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I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

Signed this 5th day of October, 2022



William Gehrke, Senior Economist  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. will@oregoncub.org

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 435**

In the Matter of )  
)  
NORTHWEST NATURAL GAS COMPANY, ) DECLARATION OF SUDESHNA PAL  
dba NW NATURAL, )  
)  
Request for a General Rate Revision (UG 435), )  
)  
Advice No. 20-19, Schedule 198 Renewable Natu )  
Gas Recovery Mechanism (ADV 1215) (UG 411).

I, Sudeshna Pal, declare under penalty of perjury under the laws of the State of Oregon:

1. My name is Sudeshna Pal. I am an economist for the Oregon Citizens' Utility Board (CUB). I am appearing in this proceeding as a witness for CUB. My business address is 610 SW Broadway, Suite 400, Portland, Oregon, 97205;
2. I sponsored pre-filed CUB's Opening Testimony and Exhibits of Sudeshna Pal (CUB/300-301, Pal) on behalf of CUB;
3. My Testimony and Exhibits previously filed are true and accurate. My testimony would be the same today as that reflected in my pre-filed testimony.

I hereby declare that the above statements are true to the best of my knowledge and belief and that I understand my testimony will be used as evidence before the Public Utility Commission of Oregon and is subject to penalty for perjury.

Signed this 20<sup>th</sup> day of September, 2022.



Sudeshna Pal, Economist  
Oregon Citizens' Utility Board  
610 SW Broadway, Ste. 400  
Portland, OR 97205  
T. 503.227.1984  
E. sudeshna@oregoncub.org