BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	)	COALITION'S MOTION TO
	)	ADMIT PRE-FILED TESTIMONY
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	)	AND EXHIBITS
	)	
Request for a General Rate Revision.	)	
	)	

Intervenors Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (the "Coalition") respectfully moves for the admission the following pre-filed testimony and exhibits into the record as evidence in this proceeding.

1. **Coalition's Opening Testimony and Exhibits filed on April 18, 2024, marked Coalition/100 through Coalition/315.**
2. **Coalition's Rebuttal and Cross-Answering Testimony filed on July 2, 2024, marked Coalition/400 through Coalition/721.**
3. **Coalition's Cross-Examination Exhibits filed on August 1, 2024, marked Coalition/801 through Coalition/802.**

Dated this 5th day of August, 2024.

Respectfully submitted,

/s/ Jaimini Parekh
Jaimini Parekh, OSB No. 226337
Kristen L. Boyles, WBSA No. 23806
(Admitted *pro hac vice*)

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Michael Mayer, WSBA No. 32135
(Admitted *pro hac vice*)
Noorulanne Jan, WBSA No. 61024
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/s/ Carra Sahler
Carra Sahler, OSB No. 024455
Green Energy Institute at Lewis & Clark Law School
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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	) DECLARATION OF
	) BRADLEY CEBULKO
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	)
Request for a General Rate Revision.	)

I, Bradley Cebulko, do hereby declare and say:

1. My name is Bradley Cebulko, and I am the founder of CEB Energy Consulting LLC. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 24125 47th Ave. SW, Vashon, WA 98070.
2. I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored the following testimony and exhibits:
    a. Coalition's Opening Testimony of Bradley Cebulko and Exhibits Coalition/100 through Coalition/111.
    b. Rebuttal and Cross-Answering Testimony of Bradley Cebulko and Exhibits Coalition/400 through Coalition/403.

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The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 5th day of August, 2024.

s/ Bradley Cebulko
Bradley Cebulko

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL, Request for a General Rate Revision.	) DECLARATION OF) NORA APTER))))))))

I, Nora Apter, do hereby declare and say:

1. My name is Nora Apter, and I am the Director of Programs for the Oregon Environmental Council. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 537 SE Ash Street, Suites 205 & 206, Portland, OR 97214.
2. I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored the following testimony and exhibits:
    a. Coalition's Opening Testimony of Nora Apter and Meredith Connolly and Exhibits Coalition/200 through Coalition/251.
    b. Rebuttal and Cross-Answering Testimony of Nora Apter and Meredith Connolly and Exhibits Coalition/500 through Coalition/532.

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The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 5th day of August, 2024.

s/ Nora Apter
Nora Apter

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	)	DECLARATION OF
	)	MEREDITH CONNOLLY
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	)	
Request for a General Rate Revision.	)	

I, Meredith Connolly, do hereby declare and say:

1. My name is Meredith Connolly, and I am the Oregon Director at Climate Solutions. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 1300 SE Stark Street, Suite 207, Portland, OR 97214.
2. I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored the following testimony and exhibits:
    a. Coalition's Opening Testimony of Nora Apter and Meredith Connolly and Exhibits Coalition/200 through Coalition/251.
    b. Rebuttal and Cross-Answering Testimony of Nora Apter and Meredith Connolly and Exhibits Coalition/500 through Coalition/532.

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The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 5th day of August, 2024.

s/ Meredith Connolly
Meredith Connolly

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	)	DECLARATION OF
	)	CHARITY FAIN
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	)	
Request for a General Rate Revision.	)	

I, Charity Fain, do hereby declare and say:

1. My name is Charity Fain, and I am the Executive Director of Community Energy Project. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 2705 E. Burnside, Suite 112, Portland, OR 97214.
2. I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored the following testimony and exhibits:
    a. Coalition's Opening Testimony of Charity Fain, Anahi Segovia Rodriguez, and Nikita Daryanani, and Exhibits Coalition/300 through Coalition/315.
    b. Rebuttal and Cross-Answering Testimony of Nikita Daryanani and Charity Fain and Exhibits Coalition/600 through Coalition/603.

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The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 5th day of August, 2024.

s/ Charity Fain
Charity Fain

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	)	DECLARATION OF
	)	ANAHI SEGOVIA RODRIGUEZ
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	)	
Request for a General Rate Revision.	)	

I, Anahi Segovia Rodriguez, do hereby declare and say:

1. My name is Anahi Segovia Rodriguez, and I am the Energy Justice Coordinator at Verde. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 4145 NE Cully Blvd., Portland OR 97218.
2. I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored the following testimony and exhibits:
    a. Coalition's Opening Testimony of Charity Fain, Anahi Segovia Rodriguez, and Nikita Daryanani, and Exhibits Coalition/300 through Coalition/315.

The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

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I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 5th day of August, 2024.

s/ Anahi Segovia Rodriguez
Anahi Segovia Rodriguez

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	)	DECLARATION OF
	)	NIKITA DARYANANI
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	)	
Request for a General Rate Revision.	)	

I, Nikita Daryanani, do hereby declare and say:

1. My name is Nikita Daryanani, and I am the Climate and Energy Policy Manager at Coalition of Communities of Color. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 221 NW 2nd Ave., Suite 303, Portland, OR 97209.
2. I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored the following testimony and exhibits:
    a. Coalition's Opening Testimony of Charity Fain, Anahi Segovia Rodriguez, and Nikita Daryanani, and Exhibits Coalition/300 through Coalition/315.
    b. Rebuttal and Cross-Answering Testimony of Nikita Daryanani and Charity Fain and Exhibits Coalition/600 through Coalition/603.

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The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 5th day of August, 2024.

s/ Nikita Daryanani
Nikita Daryanani

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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 490

In the Matter of	)	DECLARATION OF
	)	ROGER D. COLTON
NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL,	)	
Request for a General Rate Revision.	)	

I, Roger D. Colton, do hereby declare and say:

1. My name is Roger Colton, and I am the owner of Fisher, Sheehan & Colton, Public Finance and General Economics. I am appearing in this proceeding for Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club ("Coalition"). My business address is 34 Warwick Road, Belmont, MA 02478.
2. I submit this declaration in support of the Coalition's Motion to Admit Pre-Filed Testimony and Exhibits.
3. I sponsored the following testimony and exhibits:
    a. Rebuttal and Cross-Answering Testimony of Roger D. Colton and Exhibits Coalition/700 through Coalition/721.

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Seattle, WA 98104
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The above-referenced testimony and exhibits that were previously filed are true and accurate based upon my information and belief. If I were to answer these same questions today, my responses would be the same.

I hereby declare that the above statements are true to the best of my present knowledge and believe and that I understand my testimony will be used as evidence before the Public Utilities Commission of Oregon.

Dated this 5th day of August, 2024.

s/ Roger D. Colton
Roger D. Colton

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