



MICHAEL HIGHFILL
Main: (503) 595-3922
michael@mrg-law.com

June 13, 2025

VIA E-MAIL TO

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

**Re: Docket No. UG 490 – In the Matter of Northwest Natural Gas Company, dba
NW Natural, Request for a General Rate Revision / Court of Appeals No.
A186401**

Attention Filing Center:

Attached for filing in the above-captioned docket, please find Northwest Natural Gas Company's ("NW Natural") Motion to Correct the Record on Judicial Review. NW Natural respectfully requests expedited consideration of this Motion.

Please contact this office with any questions.

Sincerely,

Michael Highfill
Paralegal
McDowell Rackner Gibson PC

**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.

**NW NATURAL'S MOTION TO
CORRECT RECORD ON JUDICIAL
REVIEW**

Expedited Consideration Requested

Court of Appeals No. A186401

1 Pursuant to OAR 860-001-0420 and ORAP 4.22, Northwest Natural Gas
2 Company, dba NW Natural ("NW Natural" or the "Company") respectfully requests that
3 the Public Utility Commission of Oregon ("Commission") enter an order correcting the
4 record on judicial review as submitted to the Court of Appeals on May 30, 2025, in
5 *Northwest Natural Gas Company dba NW Natural v. Public Utility Commission of Oregon,*
6 *et al.*, Court of Appeals Case No. A186401.

7 Specifically, pursuant to ORAP 4.22(1)(b), NW Natural requests that the following
8 materials that were omitted from the record on judicial review be added:

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- 10 • Alliance of Western Energy Consumers' ("AWEC") Signatory Page to
General Protective Order No. 23-132, filed on January 24, 2024;
 - 11 • Confidential Exhibit Staff/702, filed with Commission Staff's Opening
12 Testimony and Exhibits of Russ Beitzel on April 18, 2024;
 - 13 • NW Natural's Third Update to Response to Bench Request, filed on
14 October 11, 2024; and
 - 15 • NW Natural's Petition for Judicial Review of Order No. 24-359, filed on
16 January 23, 2025.

1 Additionally, pursuant to ORAP 4.22(1)(a), NW Natural requests that the following
2 errors in the transcripts of the August 1, 2024, Evidentiary Hearing, and the
3 September 12, 2024, Oral Argument be corrected as set forth below. The Company
4 determined the corrected language by comparing the transcript with the video recordings
5 of the proceedings available on the Commission’s website.

<u>Location</u>	<u>Previous Language</u>	<u>Correction</u>
Transcript of August 1, 2024, Evidentiary Hearing		
Page 3, Line 12	“(inaudible) John”	“Noorulanne Jan”
Page 3, Line 14	“Fair Day”	“Verde”
Page 7, Line 10	“Ms. Pease:”	“Ms. Schoonover:”
Page 8, Line 15	“Ms. Pease:”	“Ms. Schoonover:”
Page 9, Lines 14 and 21	“Ms. Pease:”	“Ms. Schoonover:”
Page 11, Line 6	“...witness therein...”	“...witness Therrien...”
Page 17, Line 17	“Cost Statement”	“cross-statement”
Page 24, Line 5	“Jamie”	“Jaimini”
Page 26, Line 10	“...the Coalition’s (inaudible – audio cuts out).”	“...the Coalition’s data requests.”
Page 46, Line 4	“...that Ms. Pease asked any further questions...”	“...that Ms. Pease ask any further questions...”
Page 51, Lines 7-8	“...would you agree that the statement and your testimony...”	“...would you agree that the statement in your testimony...”
Transcript of September 12, 2024, Oral Arguments		
Page 15, Line 21	“Ms. Schoonover:”	“Commissioner Tawney:”
Page 26, Line 19	“...in our testimony in a briefing.”	“...in our testimony and in briefing.”

Page 31, Line 2	"...unlike a PGA and a GRC, there's..."	"...unlike a PGA, in a GRC there's..."
Page 32, Line 6	"...third party report value line, it still..."	"...third party report, Value Line, it still..."
Page 67, Line 24	"Staff proposes (<i>inaudible</i>) for two..."	"Staff proposes 2018 for two..."
Page 68, Lines 13-14	"...directed by the Commission to revise and utilize. The revised load assumptions and..."	"...directed by the Commission to revise and utilize the revised load assumptions and..."
Page 76, Lines 1-2	"...revenue margin (<i>inaudible/garbled</i>) approach..."	"...revenue margin multiplier approach..."
Page 76, Line 11	"...rooted in a (<i>inaudible/garbled</i>) model..."	"...rooted in a discounted cash flow model..."
Page 76, Line 25 and Page 77, Line 1	"...may lead to (<i>Inaudible</i>), and inequitable burdens on (<i>inaudible/garbled</i>)."	"...may lead to stranded assets and inequitable cost burdens on low-income customers."
Page 77, Lines 23-25	"...and I think there's a reason why Staff has to recommend (<i>Inaudible</i>) courses of action."	"...and I think it's the reason why Staff has to recommend alternative courses of action."
Page 80, Line 4	"...refrain from using an order directing..."	"...refrain from issuing an order directing..."
Page 80, Line 7	"...general (<i>inaudible</i>) to fully explore..."	"...general investigation to fully explore..."
Page 85, Lines 5-6	"...Oregon's use and useful standard."	"...Oregon's used and useful standard."
Page 86, Lines 2-4	"The AAC was a litigated issue in Northwest Natural's last rate case, Staff, CUB, and AWEC all proposed..."	"The AAC was a litigated issue in Northwest Natural's last rate case. Staff, CUB, and AWEC all proposed..."

Page 92, Lines 3 and 14	"Ms. Pease:"	"Ms. Schoonover:"
Page 94, Lines 20 and 24	"Ms. Pease:"	"Ms. Schoonover:"
Page 95, Line 3	"Ms. Pease:"	"Ms. Schoonover:"
Page 95, Lines 13-14	"...in that specific section, that is (<i>inaudible – audio cuts out</i>)."	"...in that specific section, that is what it is saying."
Page 99, Lines 4-5	"...and we'll never..."	"...and will never..."

1 Pursuant to OAR 860-001-0420(6), NW Natural respectfully requests expedited
2 consideration of this motion. The Company filed the Petition for Judicial Review nearly six
3 months ago and the record in the case is not yet settled. NW Natural seeks a timely
4 resolution of the appeal proceeding so that all parties have clarity. Expediting
5 consideration of this motion will help facilitate timely resolution of the appeal. The
6 Company attempted to confer with the parties to this proceeding and the Court of Appeals
7 proceeding: the Commission stated it does not object. Commission Staff; AWEC; Oregon
8 Citizens' Utility Board ("CUB"); and Coalition of Communities of Color, Climate Solutions,
9 Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy
10 Project, and Sierra Club ("Coalition Intervenors") did not provide a response prior to the
11 time of filing.

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Respectfully submitted this 13th day of June 2025

McDOWELL RACKNER GIBSON PC



Jocelyn C. Pease
Jordan R. Schoonover
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
Telephone: (503) 595-3922
Email: jocelyn@mrg-law.com
jordan@mrg-law.com
dockets@mrg-law.com

*Attorneys for Northwest Natural Gas
Company dba NW Natural*