

**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.	) PETITION TO INTERVENE BY ) COALITION OF COMMUNITIES ) OF COLOR, CLIMATE ) SOLUTIONS, VERDE, COLUMBIA ) RIVERKEEPER, OREGON ) ENVIRONMENTAL COUNCIL, ) COMMUNITY ENERGY PROJECT, ) and SIERRA CLUB
---	--

---

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club petition to intervene in this proceeding. In support of this petition, the following is provided:

1. The contact information of the petitioners are as follows:

Name: Nikita Daryanani  
Company: Coalition of Communities of Color  
Street Address: 221 NW 2nd Ave., Suite 303  
City, State, Zip: Portland, OR 97209  
Email Address: [nikita@coalitioncommunitiescolor.org](mailto:nikita@coalitioncommunitiescolor.org)  
Telephone: 949-365-6021

Name: Meredith Connolly  
Company: Climate Solutions  
Street Address: 1300 SE Start St., Suite 207  
City, State, Zip: Portland, OR 97214  
Email Address: [meredith.connolly@climatesolutions.org](mailto:meredith.connolly@climatesolutions.org)  
Telephone: 503-206-4837

Name: Anahi Segovia Rodriguez  
Company: Verde  
Street Address: 4145 NE Cully Blvd.  
City, State, Zip: Portland, OR 97218  
Email Address: [anahisegovia@verdenw.org](mailto:anahisegovia@verdenw.org)  
Telephone: 503-490-6243

Name: Audrey Leonard  
Company: Columbia Riverkeeper  
Street Address: 1125 SE Madison St. #103a  
City, State, Zip: Portland, OR 97214  
Email Address: [audrey@columbiariverkeeper.org](mailto:audrey@columbiariverkeeper.org)  
Telephone: 541-399-4775

Name: Nora Apter  
Company: Oregon Environmental Council  
Street Address: 1500 NE Irving Street, Ste 430  
City, State, Zip: Portland, OR 97232  
Email Address: [noraa@oeconline.org](mailto:noraa@oeconline.org)  
Telephone: 971-275-6179

Name: Kate Ayres  
Company: Community Energy Project  
Street Address: 2705 E. Burnside, Suite 112  
City, State, Zip: Portland, OR 97214  
Email Address: [kate@communityenergyproject.org](mailto:kate@communityenergyproject.org)  
Telephone: 971-415-5784

Name: Rose Monahan  
Company: Sierra Club  
Street Address: 2101 Webster Street, Suite 1300  
City, State, Zip: Oakland, CA 94612  
Email Address: [rose.monahan@sierraclub.org](mailto:rose.monahan@sierraclub.org)  
Telephone: 415-977-5704

2. Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (collectively “Petitioners”) will be represented by Kristen L. Boyles, Michael Mayer, and Noorulanne Jan from Earthjustice and Carra Sahler from the Green Energy Institute of Lewis and Clark Law School. Their contact information for inclusion in the service list is:

Kristen L. Boyles, WBSA No. 23806  
(*pro hac vice application forthcoming*)  
Earthjustice  
810 Third Avenue, Suite 610  
Seattle, WA 98104  
206-413-9872  
[kboyles@earthjustice.org](mailto:kboyles@earthjustice.org)

Michael Mayer, WSBA No. 32135  
(*pro hac vice application forthcoming*)  
Earthjustice  
810 Third Avenue, Suite 610  
Seattle, WA 98104  
206-691-8836  
[mmayer@earthjustice.org](mailto:mmayer@earthjustice.org)

Noorulanne Jan, WSBA No. 61024  
(*pro hac vice application forthcoming*)  
Earthjustice  
810 Third Avenue, Suite 610  
Seattle, WA 98104  
206-206-673-5483  
[njan@earthjustice.org](mailto:njan@earthjustice.org)

Carra Sahler, OSB No. 024455  
Green Energy Institute at Lewis & Clark Law School  
10101 S. Terwilliger Blvd.  
Portland, OR 97219  
503-768-6634  
[sahler@lclark.edu](mailto:sahler@lclark.edu)

3. Petitioners also request that Adam Hinz, paralegal at Earthjustice, be included on the service list:

Adam Hinz  
Earthjustice  
810 Third Avenue, Suite 610  
Seattle, WA 98104  
[nwparalegals@earthjustice.org](mailto:nwparalegals@earthjustice.org)

4. Coalition of Communities of Color is a coalition representing the interests of eighteen member non-profit organizations, many based in the Portland, Oregon area. The Coalition addresses the socioeconomic disparities, institutional racism, and inequity of services experienced by their families, children, and communities. The Coalition's members organize their communities for collective action resulting in social change to obtain self-determination, wellness, justice, and prosperity.

5. Climate Solutions is a regional non-profit organization working to accelerate clean energy solutions to the climate crisis. As part of this work, Climate Solutions supports a rapid and equitable transition to clean, fossil-free buildings for all. Climate Solutions has over 18,000 supporters in the Pacific Northwest, and almost 8,000 supporters in the State of Oregon.

6. Verde is a regional non-profit organization based in Portland with the mission to build environmental wealth through organizing, advocacy, and social enterprise. Verde works statewide and is rooted in the Cully neighborhood in Portland, a typical environmental justice community. Verde's members are largely Indigenous, Black, and Latinx; a majority of Verde's members are low-income and suffer from disproportionate pollution burdens.

7. Columbia Riverkeeper is a regional non-profit organization with a mission to protect and restore the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Riverkeeper's vision is to unite people to fight for clean water, abundant fish and wildlife, and our climate. Columbia Riverkeeper represents approximately 16,000 members and supporters.

8. Oregon Environmental Council is a non-profit, nonpartisan, membership-based organization that advances innovative, collaborative, and equitable solutions to Oregon's environmental challenges for today and future generations. The Council's goals are to secure a stable climate that safeguards communities and the economy; clean and plentiful water that supports people, fish and wildlife; and healthy homes and neighborhoods free of air pollution and hazardous chemicals.

9. Community Energy Project, a non-profit organization located in Portland, Oregon, provides free services focused on safety, health, and energy efficiency—with services ranging from community education and supplies to direct home energy upgrades and repairs.

Community Energy Project believes that everyone deserves a safe, healthy, efficient home, regardless of income and works with frontline communities, many of whom struggle to pay existing utility bills.

10. Sierra Club, founded in 1892, is the nation's oldest non-profit, grassroots environmental organization. The Oregon Chapter of the Sierra Club is a non-profit, member-supported, public interest organization that promotes the conservation of the Oregon natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. The Oregon Sierra Club has more than 21,000 members in the state. Sierra Club’s nearly 650,000 members nationwide are dedicated to the protection and preservation of the natural and human environment, including protecting public health. One of the Sierra Club’s priorities is to advance smart and equitable clean energy solutions that address critical problems from the climate crisis, air pollution, and our nation's dependence on fossil fuels.

11. Petitioners constitute a broad coalition of environmental, climate, environmental justice, and community-led social justice organizations who represent the interests of thousands of members and supporters—many of whom are gas utility ratepayers in the State of Oregon, including within the NW Natural service area. Petitioners are concerned several issues in the NW Natural request for a rate revision, including: the overall proposed rate increase for gas utility customers, the higher fixed charge for newer customers based on their projected lower usage, and the updated line extension allowance. Petitioners are also concerned that NW Natural’s bill discount proposal would continue to provide inadequate assistance to environmental justice and low-income communities.

12. These Petitioners were granted intervention without limitation in NW Natural’s previous rate revision request before the Public Utilities Commission, UG 435, over objections

from NW Natural. *In the Matter of Northwest Natural Gas Company*, Ruling, UG 435 (March 9, 2022). In the same order, Judge Spruce waived the service rule limitations in OAR 860-001-0180(1)(a) for good cause, a waiver Petitioners again seek.

13. Based on the information provided above in accordance with the Commission's Rules of Procedure, Petitioners request to participate in this proceeding as intervenors. Petitioners' intervention motion is timely, and their participation will not unreasonably broaden the issues, burden the record, or delay the proceedings. OAR 860-001-0300.

14. WHEREFORE, Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club respectfully request leave to intervene and request all the rights of parties in this proceeding.

Dated this 26th day of January, 2024.

Respectfully submitted,

/s/ Kristen L. Boyles

Kristen L. Boyles, WBSA No. 23806  
(*pro hac vice application forthcoming*)  
Michael Mayer, WSBA No. 32135  
(*pro hac vice application forthcoming*)  
Noorlanne Jan, WBSA No. 61024  
(*pro hac vice application forthcoming*)

Earthjustice  
810 Third Avenue, Suite 610  
Seattle, WA 98104  
206-343-7340  
[kboyles@earthjustice.org](mailto:kboyles@earthjustice.org)  
[mmayer@earthjustice.org](mailto:mmayer@earthjustice.org)  
[njan@earthjustice.org](mailto:njan@earthjustice.org)

/s/ Carra Sahler

Carra Sahler, OSB No. 024455  
Green Energy Institute at Lewis & Clark Law School  
10101 S. Terwilliger Blvd.  
Portland, OR 97219  
503-768-6634  
[sahler@lclark.edu](mailto:sahler@lclark.edu)