

September 6, 2024

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
P.O. Box 1088
Salem, Oregon 97308-1088

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

Dear Judge Spruce:

In response to Administrative Law Judge (“ALJ”) Spruce’s Memorandum issued on September 3, 2024, Northwest Natural Gas Company (“NW Natural” or “Company”) hereby submits its notice of intent to participate in the September 12, 2024 Oral Argument. Jocelyn Pease and Jordan Schoonover will appear on behalf of NW Natural. NW Natural seeks to address the following:

1. The Company’s New Premises Customer Charge and related proposal to bifurcate the decoupling baseline;
2. The Company’s proposed line extension allowance;
3. The Coalition and CUB’s proposed adjustment in connection with the administration of Schedule X;
4. The Coalition’s proposal to disallow the Company’s Government Affairs expense;
5. The Coalition’s proposal to use public purpose charge funds dedicated to the Oregon Low Income Energy Efficiency program for the installation of electric heat pumps; and
6. CUB’s rate shock proposal.

Subject to available time and Commissioner interest, NW Natural would also address any questions regarding the Company’s proposed modifications to Schedule 198 (“Renewable Natural Gas Automatic Adjustment Clause”) and the Company’s request for Commission

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guidance concerning a multi-year rate plan. Finally, NW Natural requests the opportunity to address any other issue raised by a party, Commissioners, or the ALJ during the oral argument.

Sincerely,



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