

November 28, 2023

VIA ELECTRONIC FILING

Kathy Hunter, Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, Washington 98503

Received
Records Management
Nov 28, 2023

Re: A-230217—NW Natural Response to Notice of Opportunity to File Comments

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), provides the following comments in response to the Washington Utilities and Transportation Commission's September 29, 2023 Notice of Opportunity to Provide Comments, which requested that interested persons provide written comments to the following questions:

- What Procedural Justice considerations would you like to see discussed?
- What element(s) of Procedural Justice is most important to you?

In response, NW Natural provides the following:

There are two Procedural Justice considerations that NW Natural recommends as points of focus for the Washington Utilities and Transportation Commission (Commission) as it strives to regulate towards achieving energy justice. The first consideration is proactively engaging with potential community participants to use the funding that is available for participating in regulatory proceedings. The second consideration is providing technical knowledge and facilitating accessibility to community-based organizations (CBOs) and other interested persons.

Both of these considerations play a critical role in achieving the Procedural Justice element that is most important to NW Natural, which is the meaningful involvement of frontline communities and interested persons in a regulatory process that is centered on energy justice. Energy justice requires that CBOs and other interested parties be empowered to participate fully in regulatory proceedings. This empowerment must be rooted in the ability to fully understand the technical aspects of relevant regulatory proceedings without the financial cost of such participation acting as a barrier. Therefore, supporting the funding for this participation is crucial for the regulatory process to be accessible and open to the communities that we serve.

In providing technical knowledge to CBOs and other interested persons, accessibility should be a focus, especially for those individuals from the general public that are not associated with an organized group that is already participating in Commission proceedings. Interested persons new to participating at the Commission would benefit from context and background information

about underlying Commission practices, processes, and terms. This includes an explanation of the sequence of regulatory proceedings and the purpose of actions and deliverables, as well as understanding terminology and concepts such as dockets, proceedings, rulemaking, comments, etc., so that interested persons can understand how their participation will impact the process and what types of participation would be best for them. To facilitate accessibility, the Commission should consider additional methods of communicating requests for public input by expanding the distribution of these requests to reach interested persons that are not engaged with the Commission on a regular basis. In addition, communications requesting public input should provide background information about the overall process – for example, the subject matter being asked about, how the comments are used, and what is expected of interested persons if they provide comments, etc.

NW Natural appreciates the opportunity to provide these comments and looks forward to actively participating in this docket going forward. We also agree with and support the questions posed and comments provided by Avista on October 25, 2023, filed in this docket in response to the Commission's request.

For purposes of adding to the service list for this docket and for any questions and correspondence on this matter – please contact me, with a copy to the following:

eFiling
NW Natural
250 SW Taylor Street
Portland, Oregon 97204
Fax: (503) 220-2579
Telephone: (503) 610-7330
eFiling@nwnatural.com

Sincerely,

/s/ Amy Schulties
Amy Schulties
Regulatory Affairs Consultant
NW Natural
250 SW Taylor Street
Portland, OR 97204
(503) 610-7546
amy.schulties@nwnatural.com