

250 SW Taylor Street  
Portland, OR 97204503-226-4211  
nwnatural.com

December 30, 2022

**VIA ELECTRONIC FILING**

Amanda Maxwell, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop S.E.  
Lacey, Washington 98503

Received  
Records Management  
12/30/22 09:24  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: U-210590—NW Natural Response to Notice of Opportunity to File Written Comments**

Dear Ms. Maxwell:

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), submits the following in response to the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to File Written Comments issued on November 30, 2022 (“Notice”).

The table in the attached Excel workbook summarizes NW Natural’s requested feedback about whether the revisions to the draft metrics presented in the Notice accurately reflect our thoughts and perspectives shared at the November 7, 2022 workshop. The Company also provides, in the attached workbook, feedback on the best way to incorporate (or not incorporate) the potential revisions.

As it pertains to all proposed metrics, more generally, NW Natural is seeking further clarification regarding what metrics apply to only electric or natural gas utilities, or both. As the proposed metrics are further refined in this and subsequent phases of this docket, we encourage more specificity here, perhaps with an additional column in the table that indicates which utilities are subject to each metric (gas and/or electric). The Company believes that the proposed metrics, as they are currently written, are still in a conceptual phase and we look forward to their continued refinement in this proceeding.

While NW Natural continues to support development of the proposed metrics, we do note that with a smaller service footprint in the state of Washington, the costs to implement some of the proposed metrics will have a larger cost impact on a per customer basis compared to larger utilities in the state. We note this for transparency and hope for continued discussions regarding cost impacts throughout this proceeding.

NW Natural appreciates the opportunity to comment in this proceeding. If you have any questions about these comments, please contact me at [kyle.walker@nwnatural.com](mailto:kyle.walker@nwnatural.com) or (503) 610-7051 with copies to the following:

Washington Utilities and Transportation Commission  
U-210590 NW Natural Comments  
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eFiling  
NW Natural  
250 SW Taylor Street  
Portland, Oregon 97204  
Fax: (503) 220-2579  
Telephone: (503) 610-7330  
eFiling@nwnatural.com

Sincerely,

*/s/ Kyle Walker*  
Kyle Walker  
Rates/Regulatory Affairs Manager  
NW Natural  
250 SW Taylor Street  
Portland, OR 97204  
(503) 610-7051  
kyle.walker@nwnatural.com

Attachment  
210590-NWN-PBR-Metric-Cmt-12-30-2022 (pdf and Excel)