

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
Complainant,

v.

NORTHWEST NATURAL GAS COMPANY,
Respondent.

DOCKET UG-200994

NORTHWEST NATURAL GAS COMPANY

Exhibit A

Staff DR 6

February 4, 2021

UG-200994

UTC Staff Data Request Nos. 1 - 12 to Northwest Natural Gas Company

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GENERAL INSTRUCTIONS FOR DISCOVERY

1. These data requests call for all information, including but not limited to information contained in documents or any other tangible or material thing that is known or available to Northwest Natural Gas Company, and including all information in the possession, custody, or control of you or your agents, employees, contractors, attorneys, accountants, auditors, or other persons who are under your, or your attorney's employment, direction and/or control.
2. Please send all electronic documents and data in *native format*. For any documents that cannot be transmitted via email, please provide the documents on a **thumb drive**. Staff can no longer accept compact discs.
3. Please review all Excel documents and work papers for hidden cells. Hidden cells include hidden worksheets, columns, rows, and ranges. Please ensure that all items provided pursuant to these requests do not contain any hidden cells or formulas.
4. For the purposes of these data requests, the term "document" or "documents" includes, but is not limited to, letters, emails, correspondence of any kind (including all attachments and/or enclosures), messages, facsimiles, computer files and/or other electronically stored information, spreadsheets, presentations, reports, analyses, notes, minutes, memoranda, work papers, schedules, calendars, invoices, purchase orders, inventories, photographs, graphs, charts, drawings, diagrams, and all other taped, recorded, printed, written, typed, and/or electronic information.
5. For any documents produced, **filenames may not contain any of the following characters: [& " ' ? < > # { } % ~ / \ * : + | . _]**.

DATA REQUESTS DIRECTED TO: Northwest Natural Gas Company**REQUESTED BY: David Parcell****UTC STAFF DATA REQUEST NO. 1:****Re: Cost of Capital**

Please provide copies of the following documents for Northwest Natural Gas ("NWNG") and Northwest Natural Holding Co. ("NWNH"):

- a. 2020 Annual Report to Stockholders (when available)
- b. 2020 Statistical Supplement to Annual Report (when available)
- c. 2020 Form 10-K (when available)
- d. Prospectus for most recent public offering of common stock
- e. Prospectus for most recent public offering of long-term debt

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UTC STAFF DATA REQUEST NO. 2:

Re: Cost of Capital

Please provide copy of all reports prepared by rating agencies that describe NWNG and NWNH for the period 2020 to the present.

UTC STAFF DATA REQUEST NO. 3:

Re: Cost of Capital

Please provide copy of all reports prepared by security analysts that describe NWNH for the period 2020 to the present.

UTC STAFF DATA REQUEST NO. 4:

Re: Cost of Capital

Please provide a schedule that shows the capital structures (common equity, preferred stock, long-term debt and short-term debt) for NWNG for period 2016 – 2020 and for the test period in this proceeding. Please provide the same information for NWNH from the date of its inception, 2018 to 2020 and the test period.

UTC STAFF DATA REQUEST NO. 5:

Re: Cost of Capital

Please provide a schedule that shows the various security ratings of NWNG and NWNH for each year 2016 to the present.

UTC STAFF DATA REQUEST NO. 6:

Re: Cost of Capital

Please provide copy of any presentations of NWNG and NWNH given to security analyses and rating agencies in 2020 and 2021.

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**DATA REQUESTS DIRECTED TO: Brody J. Wilson
REQUESTED BY: David Parcell****UTC STAFF DATA REQUEST NO. 7:****Re: Cost of Capital**

Please provide the following information for each rate proceeding that NWNG has filed in Washington and Oregon since 2010:

- a. Docket No.,
- b. Date of Filing,
- c. Test Period,
- d. Capital Structure Requested,
- e. Capital Structure Adopted,
- f. Cost of long-term debt Requested
- g. Cost of long-term debt Adopted,
- h. Cost of short-term debt Requested,
- i. Cost of short-term debt Adopted,
- j. Cost of equity Requested,
- k. Cost of equity Adopted, and
- l. Whether case was settled or litigated.

UTC STAFF DATA REQUEST NO. 8:**Re: Cost of Capital**

Please provide copies of the Moody's and Standard & Poor's reports associated with the changes in NWNG's ratings subsequent to 2008.

UTC STAFF DATA REQUEST NO. 9:**Re: Cost of Capital**

Please provide copies an any Moody's and Standard & Poor's ratings reports on NWNG prepared subsequent to those contained in Exhs. BJW-2 and BJW-3.

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**DATA REQUESTS DIRECTED TO: Bente Villadsen
REQUESTED BY: David Parcell****UTC STAFF DATA REQUEST NO. 10:****Re: Cost of Capital**

Please identify every public utility rate proceeding in the United States in which Dr. Villadsen has submitted cost of capital testimony for the period 2008 to the present. For each proceeding identified, please provide the following information:

- a. Name of utility,
- b. Name of client,
- c. Jurisdiction,
- d. Docket Number,
- e. Cost of equity recommended,
- f. Cost of equity authorized,
- g. Total cost of capital recommended, and
- h. Total cost of capital authorized.

UTC STAFF DATA REQUEST NO. 11:**Re: Cost of Capital**

Please indicate the currently authorized returns on equity, by state and subsidiary, for each of the proxy companies used by Dr. Villadsen.

UTC STAFF DATA REQUEST NO. 12:**Re: Cost of Capital**

Witness Villadsen states on page 24, lines 3-6 of her testimony that interest rates are expected to increase. Please identify any testimonies of Dr. Villadsen over the 2009 to 2020 period in which she did not predict interest rates were going to rise.

/s/ Nash Callaghan, WSBA No. 49682
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