

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

NORTHWEST NATURAL GAS COMPANY,

Respondent.

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DOCKETS UG-200994, UG-200995, UG-200996, and UG-210085 (*Consolidated*)

**TESTIMONY OF COREY J. DAHL  
ADDRESSING THE FULL MULTI-PARTY SETTLEMENT AGREEMENT  
ON BEHALF OF  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**Exhibit CJD-1T**

July 27, 2021

1 **Q. Please state your name and business address.**

2 A. My name is Corey Dahl, and I serve as a regulatory analyst for the Public Counsel  
3 Unit of the Washington State Office of the Attorney General (“Public Counsel”).  
4 My business address is 800 5<sup>th</sup> Ave, Suite 2000, Seattle, Washington, 98104.

5 **Q. On whose behalf are you testifying?**

6 A. I am testifying on behalf of Public Counsel in this proceeding.

7 **Q. Have you previously testified in this proceeding?**

8 A. No, I have not yet testified in this proceeding.

9 **Q. Please state your qualifications.**

10 I earned a B.A. in Economics and a B.A. in English from the University of St.  
11 Thomas in St. Paul, Minnesota in 2011. In 2016, I earned a Master of Public  
12 Administration degree from the Daniel J. Evans School of Public Policy and  
13 Governance at the University of Washington in Seattle. While completing my  
14 graduate studies, I worked on low-income and housing policy for a non-profit  
15 advocacy organization and worked as a legislative assistant for the Seattle City  
16 Council. Additionally, I completed Michigan State University and the National  
17 Association of Regulatory Utility Commissioners’ Utility Rate School in May  
18 2017.

19 My current employment with Public Counsel began in October 2016. Since  
20 joining the Attorney General’s Office, I have worked on a variety of energy,  
21 transportation, and telecommunications matters, including Avista’s 2019 General  
22 Rate Case (Dockets UE-190335 and UG-190335), Lugg’s 2020 Complaint (Docket  
23 TV-200029), WasteXpress’s 2020 Complaint (Docket TG-200131), Dolly’s

1           Petitions for Household Goods Mover Permits (Dockets TV-190593 and  
2           TV-190594), CenturyLink’s 2017 911 Outage Complaint (Docket UT-190209),  
3           Cascade’s 2017 General Rate Case (Docket UG-170929), Puget Sound Energy’s  
4           2017 General Rate Case (Dockets UE-170033 and UG-170034), Avista’s 2017  
5           General Rate Case (Dockets UE-170485 and UG-170486), the Puget Sound Energy  
6           Greenwood Explosion Complaint (Docket PG-160924), Pacific Power’s Schedule  
7           300 Tariff Revision case (Docket UE-161204), the CenturyLink-Level3 Merger  
8           (Docket UT-170042), Cascade Natural Gas Company’s 2017 General Rate Case  
9           (Docket UG-170929), the Avista-Hydro One Merger (Docket U-170970), Avista’s  
10          2018 Depreciation Petition (Dockets UE-180167 and UG-180168), CenturyLink’s  
11          2017 911 Outage Complaint (Docket UT-190209), and the 2019 Avista Remand  
12          (Dockets UE-150204, UG-150205, and UE-190222).

13                       I testified on behalf of Public Counsel in the 2020 Avista General Rate Case  
14          Settlement (Dockets UE-200900 and UG-200901), 2019 PacifiCorp General Rate  
15          Case Settlement (Docket UE-191024), 2019 Avista General Rate Case Partial  
16          Settlement (Dockets UE-190334 and UG-190335), in support of the settlement  
17          regarding the merger of CenturyLink and Level3 Communications (Docket  
18          UT-170042) in May 2017, on low-income issues in Cascade’s General Rate Case  
19          (Docket UG-170929), and in the Avista-Hydro One Merger Settlement (Docket  
20          U-170970).

21                       Beyond adjudications, I have worked on rulemakings, low-income rate  
22          assistance, energy conservation, and integrated resource plan (IRP) issues for  
23          multiple Washington utilities. In particular, I have been involved in several

1 rulemakings, including the CETA IRP Rulemaking (Docket UE-190698), CETA  
2 EIA Rulemaking (Docket UE-190652), CETA CEIP Rulemaking (Docket  
3 UE-191023), CETA Purchases of Electricity Rulemaking (Docket UE-190837),  
4 generic Cost of Service Collaborative (Dockets UE-170002 and UG-170003), and  
5 IRP Rulemaking (Docket U-161024). Additionally, I participate in conservation  
6 advisory groups for Puget Sound Energy and Cascade Natural Gas, as well as the  
7 Northwest Natural Gas IRP Technical Working Group, Cascade IRP Technical  
8 Advisory Committee, and the Avista IRP Technical Advisory Committee. I also  
9 participate in low-income advisory groups for Cascade Natural Gas, Puget Sound  
10 Energy, and Avista. More recently, I have observed the Puget Sound Energy Equity  
11 Advisory Group and participated in Avista’s and Puget Sound Energy’s Clean  
12 Energy Implementation Plan Advisory Groups.

13 **Q. Please explain the purpose of your testimony.**

14 A. I am testifying to address the terms of the Full Multi-Party Settlement Agreement,  
15 as filed with the Commission on July 27, 2021, in this docket. The Settlement  
16 addresses all litigated issues raised by parties in this proceeding. The parties to the  
17 Settlement are Northwest Natural Gas Company (“NW Natural” or “Company”),  
18 Commission Staff, the Alliance of Western Energy Consumers (“AWEC”), and  
19 The Energy Project (“TEP”) (collectively, “Settling Parties”).

20 **Q. What is Public Counsel’s position on the Settlement?**

21 A. Public Counsel is not a party to the Settlement. Public Counsel neither supports nor  
22 opposes the agreement reached by the Settling Parties.

1 **Q. Are there specific terms that Public Counsel would like to highlight as**  
2 **reasonable under the Settlement?**

3 A. Yes. Public Counsel believes that the terms related to the Year Two Review and  
4 Reconciliation Process and Low-Income Programs under the Settlement benefit  
5 NW Natural's customers.

6 **Q. Please describe the revenue requirement and multi-year rate plan included in**  
7 **the Settlement.**

8 A. The Settlement includes a two-year, multi-year rate plan. In year one, the Settling  
9 Parties agree that the revenue requirement should increase by \$5.0 million on  
10 November 1, 2021. In year two, the settling parties agree that the revenue  
11 requirement should increase an additional \$3.0 million on November 1, 2022. The  
12 second year rate increase is subject to a review and reconciliation process.

13 **Q. Please describe the review and reconciliation process that applies to the second**  
14 **year of the multi-year rate plan.**

15 A. The Settlement outlines eight capital projects NW Natural plans to put in service  
16 during the rate plan's second year, which account for the \$3.0 million revenue  
17 requirement increase. The projects, as enumerated in the Settlement, will be subject  
18 to review, based on a Second Year Pro Forma update the Company must file by  
19 February 28, 2023. The Company's filing must describe any changes to the  
20 estimated costs, reasons for differences in cost estimates, evidence that cost  
21 overruns were prudent, and actual in-service dates. If actual costs are less than the  
22 estimated \$3.0 million, customers will receive a rebate. The Settlement also  
23 provides that the second year increase will not exceed \$3.0 million. However, the

1 Settlement provides that NW Natural may request recovery of prudent amounts  
2 exceeding \$3.0 million in a subsequent rate case. Other Parties, including Public  
3 Counsel, have the ability to respond to the Company's Second Year Pro Forma  
4 update filing.

5 **Q: Why does Public Counsel believe the term related to the second year review**  
6 **benefits customers?**

7 A. The Commission's Used and Useful Policy Statement in Docket U-190531  
8 contemplated a review and reconciliation process for utility plant that goes into  
9 service during a multi-year rate plan. The Settlement term provides a framework  
10 for that review and reconciliation process to happen during the proposed multi-year  
11 rate plan. Reviewing plant during the multi-year rate plan is important to ensure  
12 that customers are receiving the benefit of plant they are paying for in rates.

13 **Q. Please describe the terms relating to the Company's low-income rate**  
14 **assistance program?**

15 A. The Company maintains an energy assistance program for income-qualified  
16 customers, known as the Gas Residential Energy Assistance Tariff ("GREAT")  
17 program. The Settlement Agreement contains three terms related to GREAT,  
18 including:

19 • **Advisory Group:** The Company agrees to maintain an advisory group to  
20 provide advice on GREAT program administration and review any changes to  
21 benefit administration. The group will meet at least twice per year. Stakeholders  
22 involved in the group include, but are not limited to, Staff, Public Counsel, the  
23 Energy Project, Community Action Partnership agency representatives, and

1 other interested parties. This is in line with the groups that meet for the other  
2 Washington investor-owned utilities.

3 • **Reporting Requirements:** The Company agrees to submit an annual report for  
4 the results of their program in the preceding year. This will include information,  
5 such as the amount of benefits distributed to customers, the amount of GREAT  
6 funds versus federal Low Income Heating Assistance Program funds provided  
7 to customers, and the number of customers receiving benefits.

8 • **Low-income Needs Assessment:** The Company agrees to retain an  
9 independent third party to provide an in-depth analysis of customer income  
10 demographics and the need that exists for rate assistance, compared to those  
11 currently enrolled in assistance programs. This will help inform future program  
12 budgeting, outreach, and administrative decisions.

13 **Q: Why does Public Counsel believe the term addressing low-income assistance**  
14 **benefits customers?**

15 **A:** The multi-year rate plan provided for in the Settlement will increase customer rates  
16 in both Year One and Year Two. Increasing the funds available for low-income  
17 assistance will mitigate the negative impact this will have on the most vulnerable  
18 customers. This funding is even more important under the current circumstances as  
19 customers recover from the COVID-19 pandemic, which has negatively impacted  
20 customers' ability to pay their utility bills.

1 **Q: Does Public Counsel recommend that the Commission approve or reject the**  
2 **Settlement?**

3 A: Because Public Counsel takes no position on the Settlement, Public Counsel  
4 provides no recommendation to the Commission regarding whether it should  
5 approve or reject the Settlement.

6 **Q. Does this conclude your testimony?**

7 A. Yes, it does.