

**Puget Sound Energy COVID-19 Cost Deferral Petition
Dockets UE-200780 and UG-200781**

**Avista Corporation COVID-19 Cost Deferral Petition
Dockets UE-200407 and UG-200408**

**Pacific Power & Light Company COVID-19 Cost Deferral Petition
Docket UE-200234**

**Cascade Natural Gas Corporation COVID-19 Cost Deferral Petition
Docket UG-200479**

**NW Natural COVID-19 Cost Deferral Petition
Docket UG-200264**

**DECLARATION OF LISA W. GAFKEN
IN SUPPORT OF JOINT RESPONSE OF
THE OFFICE OF THE WASHINGTON ATTORNEY GENERAL
PUBLIC COUNSEL UNIT
AND
THE ENERGY PROJECT**

**Exhibit No. 8:
Cascade and NW Natural's Response to Public Counsel and
The Energy Project Informal Data Request No. 5**

**Cascade's Response to Public Counsel and
The Energy Project Informal Data Request No. 5**

Request No. 5

Date prepared: 9/24/20

Preparer: Kevin Conwell

Contact: Christopher Mickelson

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PC/TEP-5 Does the Company contend that its employee labor, benefits, payroll taxes and other labor-related costs have increased, in overall terms, due to changed operating policies and/or procedures, where such changes were directly or indirectly caused by the COVID-19 pandemic and the Company's responses to the pandemic? If your response is affirmative, please provide the following information:

- a) Monthly total recorded labor hours charged to O&M expense, to capital and to other (identified) accounts in each month of 2019 and 2020, to date, separately for each bargaining unit and salaried department with the Company.
- b) Describe which departments and labor hour amounts in your response to part (a) are believed to have increased as a result of COVID-related changes, indicating the known causes of such increases.
- c) Describe and quantify, to the extent possible, which departments and labor hour amounts in your response to part (a) are believed to have declined as a result of COVID-related changes, indicating the known causes of such reductions.

Response:

The Company doesn't contend that employee labor, benefits and related payroll taxes have increased as a result of changed operating policies & procedures directly or indirectly caused by the pandemic.

**NW Natural's Response to Public Counsel and
The Energy Project Informal Data Request No. 5**



Rates & Regulatory Affairs
UG-200264
COVID-19 Accounting Order Petition
Data Request Response

Date of Response: September 25, 2020
Responder: Amanda Faulk
Telephone: 503-610-7545
Email: Amanda.Faulk@nwnatural.com
Witness: Will update when known

Request No.: UG-200264 PC TEP IR 5

Does the Company contend that its employee labor, benefits, payroll taxes and other labor-related costs have increased, in overall terms, due to changed operating policies and/or procedures, where such changes were directly or indirectly caused by the COVID-19 pandemic and the Company's responses to the pandemic? If your response is affirmative, please provide the following information:

- a) Monthly total recorded labor hours charged to O&M expense, to capital and to other (identified) accounts in each month of 2019 and 2020, to date, separately for each bargaining unit and salaried department with the Company.
- b) Describe which departments and labor hour amounts in your response to part (a) are believed to have increased as a result of COVID-related changes, indicating the known causes of such increases.
- c) Describe and quantify, to the extent possible, which departments and labor hour amounts in your response to part (a) are believed to have declined as a result of COVID-related changes, indicating the known causes of such reductions.

Response:

The Company is not proposing deferral of increases in labor, benefits, payroll taxes and other labor-related costs directly or indirectly caused by the COVID-19 pandemic.

The current summary of costs incurred through August 2020 and deferred at UG-200264 PC TEP IR 15 does include a minimal amount of incremental overtime that was determined to be directly related to change in operating processes and policies in response to the pandemic.

- a)-c) The response to the first question above is not in the affirmative.