



March 23, 2026

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VIA EMAIL

Columbia County Planning Commission
230 Strand Street
St. Helens, OR 97051

Re: Application CU 25-169 – Applicant’s Second Open Record Period Submittal

Dear Chair Lynch and Honorable Planning Commissioners:

This submittal provides Northwest Natural Gas Company’s (“NW Natural”) supplemental responses to issues raised in the Northwest Environmental Defense Center’s (“NEDC”) March 16, 2026 comments in the above-referenced Application.

1. Road Proposal

NEDC incorrectly asserts that the March 2, 2026 staff report (“Staff Report”) would impermissibly grant NW Natural “ongoing, open authority to construct roads.” To the contrary, the Staff Report concludes that “road access to the well pad locations to be developed with the facilities reviewed herein, are established and no new road accesses are necessary or proposed.” Staff Report at 11.

To be clear, NW Natural has not requested and is not proposing approval to construct new roads. If the Commission believes additional clarity is needed on this point, NW Natural would support eliminating staff’s proposed Condition of Approval 4.D from the Commission’s decision.¹

2. Emergency Fire Access (Exhibit Y)²

NEDC incorrectly asserts that the Staff Report does not adequately analyze “increase[d]” fire risks from the well pads proposed as part of the Project before the County, or the sufficiency of emergency access routes to the well pads. To the contrary, fire risks have already been addressed

¹ Proposed Condition of Approval 4.D reads: “ROAD DEVELOPMENT: Road development shall be conservative and minimized to only that which is necessary to support development of the use authorized through this review. The applicant shall utilize existing roads as much as possible.” NW Natural does not agree that this condition is legally impermissible.

² For the Commission’s convenience, this exhibit lettering continues the lettering in NW Natural’s February 17, 2026, March 2, 2026, and March 16, 2026 supplemental submittals, which included Exhibits A through X.

March 23, 2026

Page 2

at length in both the Staff Report (*e.g.*, pages 9, 10, 13, 14, and 21) and NW Natural’s prior submittals (*e.g.*, Applicant’s Exhibits J, K, and V).

Nevertheless, Exhibit Y to this submittal is a supplemental letter from Mist-Birkenfeld Rural Fire Protection District (“RFPD”) Fire Chief Joe Kaczenski confirming that:

- A. there is existing road access to all four well pads proposed in the Application;
- B. the access roads will allow RFPD fire crews and emergency response vehicles to reach each well pad in the event of a fire or other emergency; and
- C. in Chief Kaczenski’s professional opinion, the well pads and wells will not significantly increase fire risks.

3. Local and Regional Benefits of Project (Exhibit Z)

Finally, NEDC relies on isolated excerpts from NW Natural’s 2025 Integrated Resource Plan (“IRP”) to assert that the Project is not “necessary for local or regional energy needs.” This assertion is not legally relevant to the Commission’s decision. Moreover, it is wrong.

To correct NEDC’s assertion, Exhibit Z to this submittal is a supplemental letter from David Weber, Vice President of Gas Supply and Utility Support Services at NW Natural. Mr. Weber attended and testified at the March 9 hearing and previously submitted written testimony explaining the processing use proposed at the well pads (Applicant’s Exhibit I). As further discussed in Mr. Weber’s letter, the Project is a vital part of the regional energy supply, which will strengthen seasonal balancing, enhance reliability and resilience, and support energy needs in Columbia County and across Oregon and the Pacific Northwest.

Thank you for your consideration.

Sincerely,



Merissa A. Moeller

cc: Kate McGuire, Planning Director

Enclosures:

Exhibit Y – Supplemental Letter from Mist-Birkenfeld RFPD Chief Kaczenski
Exhibit Z – Supplemental Letter from David Weber
Attachment 1 – Excerpts from Stakeholder Presentation

Exhibit Y – Supplemental Letter from Mist-Birkenfeld RFPD Chief Kaczinski



Mist-Birkenfeld Rural Fire Protection District

12525 Highway 202, Mist, OR 97016

Office- 503-755-2710

March 18, 2026

Board Members

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::

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Rene Armstrong

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Larry Boxman

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Fire Chief

Joe Kaczinski

Columbia County Planning Commission
230 Strand St.
St. Helens, OR 97051

RE: CU 25-169 Planning Application from
Joe Kaczinski, Mist-Birkenfeld RFPD Fire Chief

Dear Honorable Planning Commissioners:

I understand that Northwest Natural Gas Company ("NW Natural") is proposing to develop four well pads as part of Columbia County Planning Application No. CU 25-169. I have reviewed the existing access roads serving all four well pad locations. Based on my review, there is existing road access to all four well pads, and the access roads will allow Mist-Birkenfeld RFPD fire crews and emergency response vehicles to reach each well pad in the event of a fire or other emergency. Additionally, in my professional opinion, the well pads and wells will not significantly increase fire risks.

Please feel free to contact our office if you have questions or concerns.

Sincerely,

Joe Kaczinski
Fire Chief
Mist-Birkenfeld RFPD
503-755-2710
joek@mistbirkenfeldrfd.org

Exhibit Z – Supplemental Letter from David Weber

March 23, 2026

VIA EMAIL

Columbia County Planning Commission
230 Strand St.
St. Helens, OR 97051

Re: Supplemental Letter from David Weber for CU 25-169

Dear Honorable Planning Commissioners:

My name is David Weber, and I am the Vice President of Gas Supply and Utility Support Services at Northwest Natural Gas Company (“NW Natural”). I attended the public hearing on March 9, 2026, where NW Natural’s President Kim Rush spoke to the local and regional benefits of NW Natural’s Conditional Use Permit application (CU 25-169) to construct and operate twelve wells on four well pads (the “Project”) at the existing Mist Facility. I write to further clarify those benefits and correct several misleading assertions in the Northwest Environmental Defense Center’s (“NEDC”) March 16, 2026 comment letter.

As Ms. Rush explained at the March 9 hearing and NW Natural has explained in its other submittals to the County, the Mist Facility is an essential part of the Northwest’s energy supply, security, and resiliency. While our region works toward decarbonization objectives, natural gas remains a vital energy source that currently has no replacement. As demonstrated during the January 2024 severe winter storm, the Mist Facility is indispensable to regional energy reliability. During that five-day event, the Mist Facility delivered a record volume of gas—providing reliable heat and power for the equivalent of 630,000 residential customers who would otherwise have been without service.¹ The Mist Facility also helps moderate energy costs for Oregonians and other customers throughout the Northwest. To put this benefit in concrete terms, replacing Mist’s energy storage capability with a lithium-ion battery would cost around *three trillion dollars* at today’s prices. NW Natural has presented these and other benefits from the Mist Facility to key stakeholders, and excerpts from that presentation are included as Attachment 1.

NEDC’s March 16 comment relies on a narrow and incorrect reading of NW Natural’s Integrated Resource Plan (“IRP”) to suggest that the Project lacks local or regional purpose because it will not serve “core” utility customers. As context, the Mist Facility serves both “core” NW Natural customers—utility customers who receive gas directly from NW Natural to heat and power their homes and businesses—and “non-core” customers—other commercial and industrial

¹ A recent Pacific Northwest Utilities Conference Committee Report further explains that the regional electric system cannot address current winter peak energy demands, even *with* continued reliance on coal and natural gas—much less address the extensive additional demands forecasted from adding gas space heating and new data centers in the region. See <https://www.pnucc.org/wp-content/uploads/2024-PNUCC-Northwest-Regional-Forecast-final.pdf>.

entities that purchase gas from NW Natural to generate power. For example, the Project will directly support Portland General Electric (“PGE”), a non-core customer that relies on gas from the North Mist Compressor Station to generate electricity at Port Westward—a clear local benefit. The IRP addresses only core customer demand and does not govern, assess, or limit NW Natural’s service to non-core customers like PGE or others in Oregon or the broader region. NEDC’s reliance on isolated IRP excerpts therefore has no bearing on the purpose or necessity of this Project.

Moreover, the Mist Facility operates as a single, interconnected system, and NEDC’s narrow focus on core versus non-core customers is an oversimplification that ignores these operational realities. As one example, the Project before the County will enable NW Natural to draw from three additional reservoirs during maintenance or unexpected outages elsewhere at the Mist Facility. This added operational flexibility enhances resilience and ensures continuity of service during periods of stress on the regional energy grid. The fact that the Project will not be used *exclusively* to meet core customer demand does not mean the Project is *unnecessary* to meet local or regional energy needs.

As reflected in our prior submittals and testimony, the Project will strengthen seasonal balancing, enhance reliability and resilience, and support regional energy needs across Oregon and the Pacific Northwest. Thank you for your consideration.

Sincerely,



David Weber
Vice President of Gas Supply and Utility Support Services
Northwest Natural Gas Company

Enclosures:

Attachment 1 – Excerpts from Stakeholder Presentation

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Mist Underground Natural Gas Storage Resiliency Project



2024



Mist Storage in service for 35 years



1979

Mist gas field discovered about 60 miles northwest of Portland

1989

Storage facility in service

1990-2007

Deliverability and capacity increases through expansion projects

2001

Beginning of FERC-approved Mist Interstate Storage Service (ISS)

2004

Completion of 24" South Mist Pipeline Extension (under separate site certificate)

2019

Completion of North Mist Expansion Project in service to Portland General Electric (PGE) to support renewable generation

Mist Storage has two compressor stations, one serving core customers and one PGE



North Mist

- 4 BCF working capacity
- 120 MMSCFD max withdraw rate
- 3,750 total compression hp
- 1 reservoir pool (Adams)



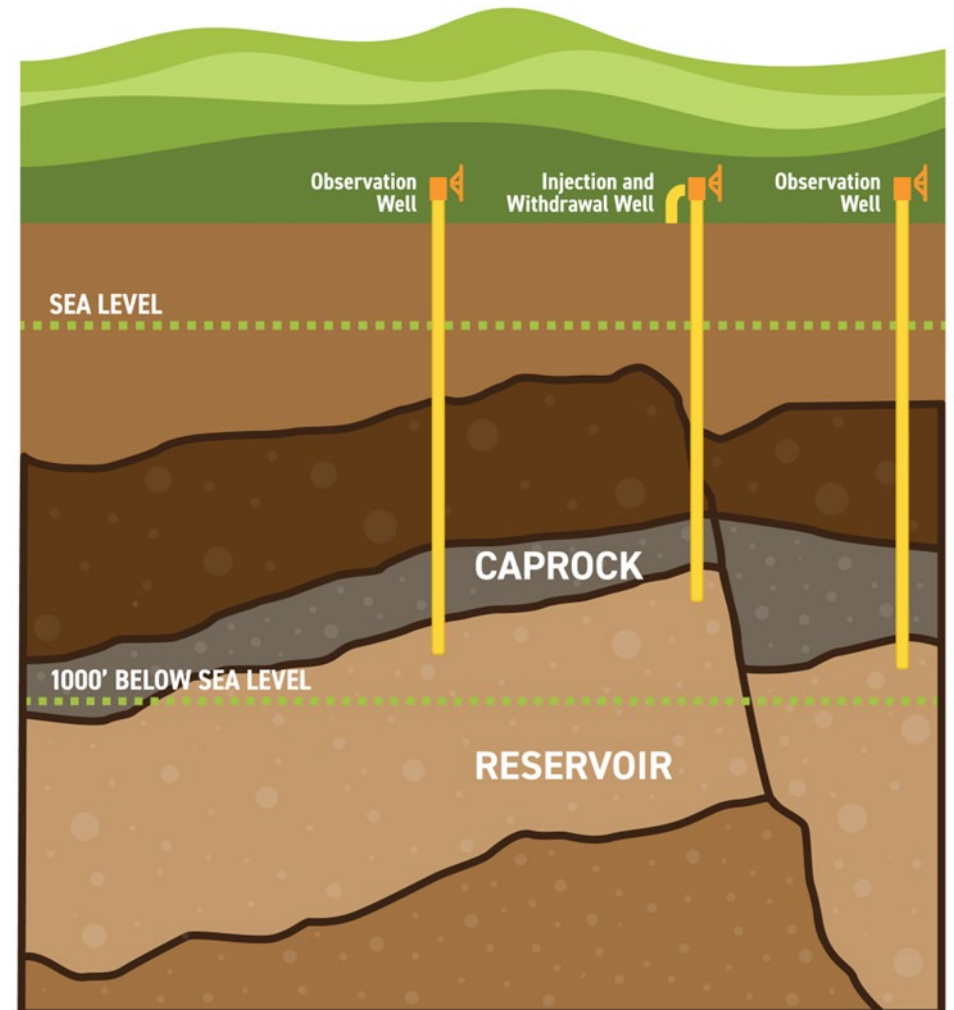
Miller Station

- 17.5 BCF working capacity
- 515 million cubic feet per day (MMSCFD) max withdraw rate
- 15,400 total compression hp
- 7 reservoir pools (Flora, Bruer, Meyer, Busch, Reichhold, Als, Schlicker)

Mist Storage Site utilizes existing natural gas reservoirs



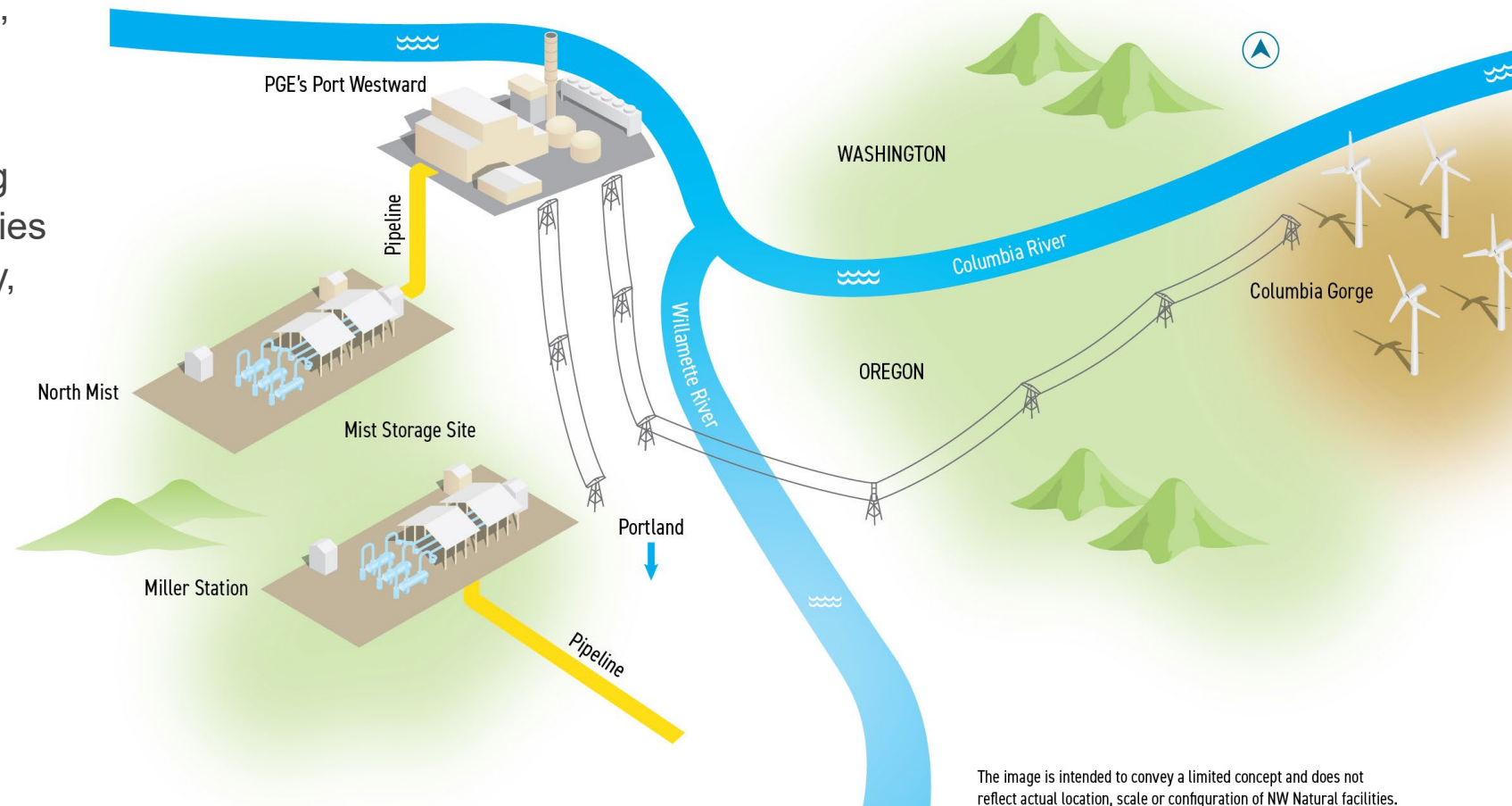
- Ideally located within NW Natural's service territory, allowing for efficient gas delivery with less pipelines
- Geological conditions include sandstone zones of reservoir quality that are used to store gas
- Oregon Department of Geology and Mineral Industries (DOGAMI) permits well construction and gas injection through ORS 520 and OAR 632-010
- Pipeline and Hazardous Materials Safety Administration (PHMSA) regulates underground gas storage through 49 CFR 192.12 and 49 CFR 192.7



The image is intended to convey a limited concept and does not reflect actual location, scale or configuration of NW Natural facilities.

Mist Storage is a core part of the Northwest energy supply

- Consists of underground natural gas storage reservoirs, associated piping, compressor stations, and operations, maintenance facilities
- Provides efficient means of balancing relatively constant pipeline gas supplies with widely fluctuating seasonal, daily, and hourly market requirements
- Current Capacity:
 - 8 Storage Reservoirs in Operation
 - 21.6 Billion Cubic Feet (BCF) Working Gas Capacity
 - 0.6+ BCF Max. Daily Deliverability
 - Equivalent to about 6 million MWh of energy



The image is intended to convey a limited concept and does not reflect actual location, scale or configuration of NW Natural facilities.

Mist Storage is an essential part of our supply portfolio

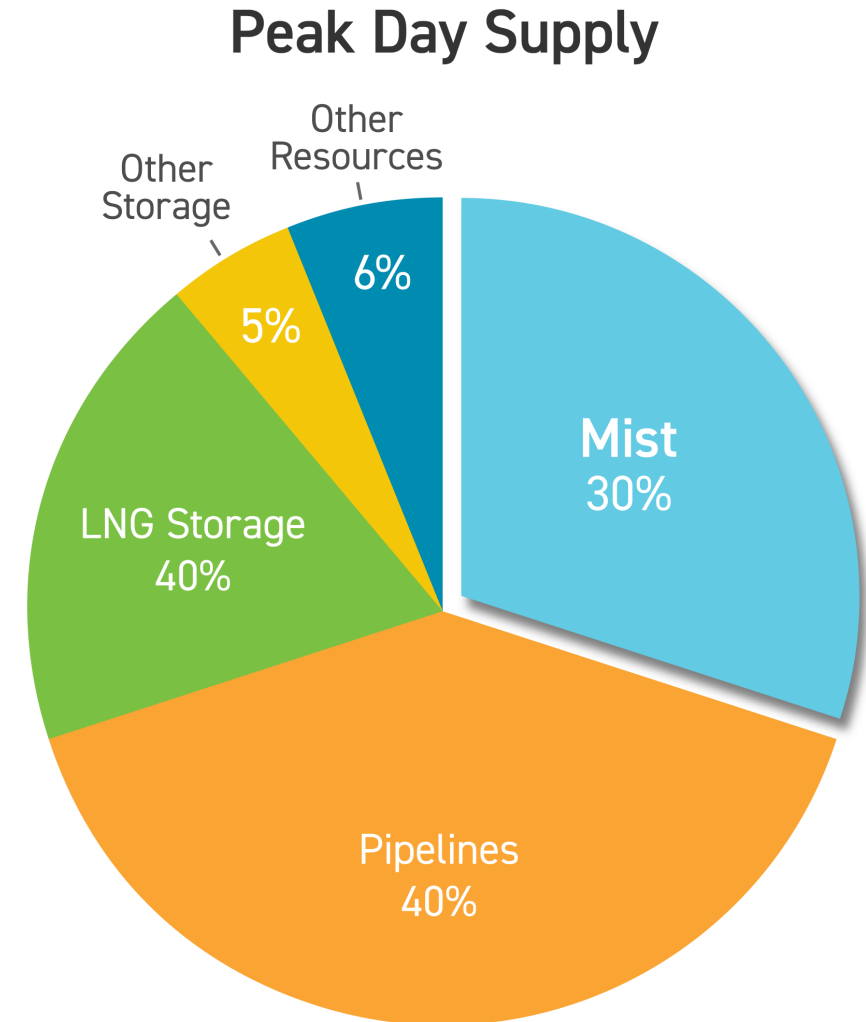
- One of only two underground energy storage facilities in the Pacific Northwest
- Ideally located in NW Natural's service territory, allowing for efficient gas delivery with less pipelines
- Valuable resiliency resource – has been beneficial to the entire region in emergencies
- To replicate NW Natural's energy storage capability with a lithium-ion battery would cost about \$3 trillion at today's prices



Mist Storage provides 30% of NW Natural customer demand during peak day



- We plan for a design peak day which is a modeled 24-hour period of maximum system deliveries
- Our planning assumes all resources are available at their maximum output, so they need to be reliable
- If we are unable to meet peak day demand, customers would lose gas service
- Mist provides 30% of the gas supply needed on our design peak day for 2023-24



Mist Storage delivers significant benefits to customers



Operational Stability and Customer Reliability

- Provides the most efficient means of balancing gas supplies with widely fluctuating seasonal, daily, and hourly demand requirements
- Ensures there is enough gas to meet customer demand during peak gas use periods or in the event of a disruption on the interstate pipeline system



Commodity Cost Optimization

- Enables NW Natural to buy gas during off peak times, like the summer – when costs are usually lowest – and store it until it is needed in the winter. Buying in the summer also reduces transportation costs on, and the need for incremental, interstate pipelines. Savings on gas and transportation costs translate directly to lower rates for customers
- Optimized financial value is credited back to utility customers



Regional Resilience

- In 2001, NW Natural began offering storage capacity at Mist to other large natural gas users or distributors throughout the Pacific Northwest which allows for increased efficiency and greater regional benefits
- In various instances, upstream pipelines have had emergencies and Mist was able to quickly reverse flows from injections to withdrawals to provide regional support

In January 2024, Mist set new delivery records

Severe weather lasting 5 days: January 12-16, 2024

- Interrupted all interruptible customers

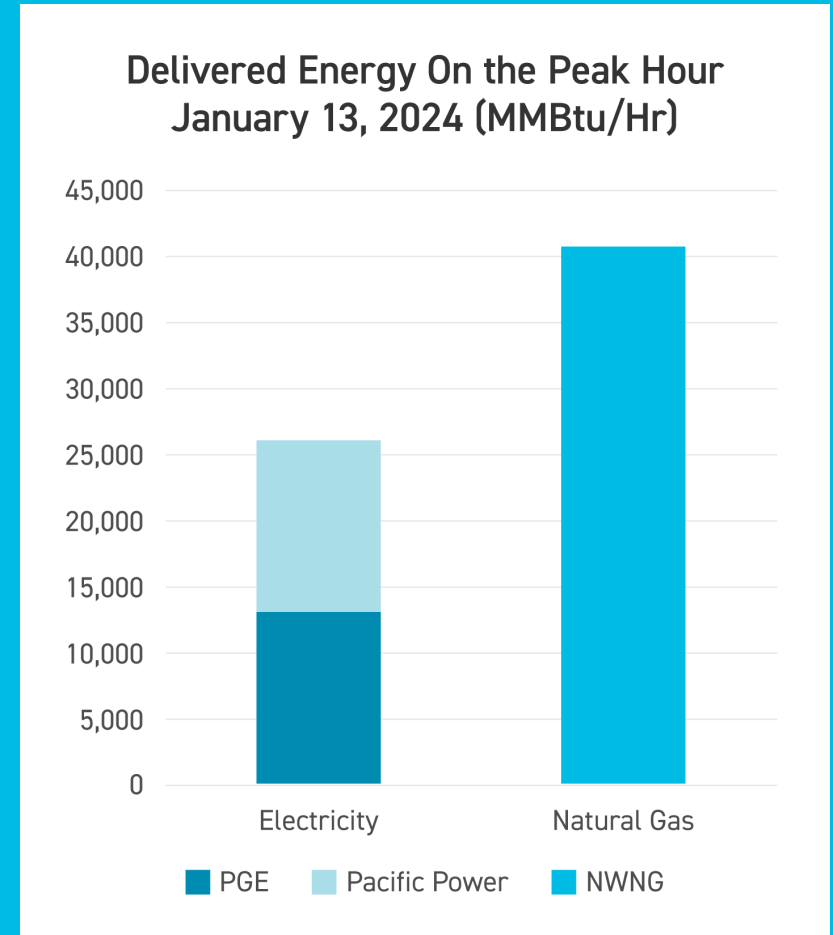
Event System Stats:

- Record Firm Sendout: 802,361 dekatherms on 01/13/2024
- Previous Record: 792,746 on 12/22/2022

Record high withdrawals from Mist storage facility: 456,571 dekatherms

- Energy to heat 633,000 homes, just from Mist storage
- During this long peak event, 5 all-time highest withdrawals from our facility

During the peak hour on January 13, 2024, NW Natural delivered 55% more energy than PGE and Pacific Power combined.



Source: ICF Using EIA Real Time Operating Grid Data



Thank You