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August 31, 2010

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket UM 1286 – Motion for Waiver of PGA Filing Date

Enclosed for filing in the above-referenced docket are the original and one copy of NW Natural's Motion for Waiver of PGA Filing Date.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo
Legal Assistant

Enclosure
Cc: Service List

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing document in OPUC Docket No. UM 1286 by electronic mail and first class mail to the following parties or attorneys of parties:

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Dated August 31, 2010

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1286

**In the Matter of THE PUBLIC UTILITY
COMMISSION OF OREGON Investigation
into the Purchased Gas Adjustment
(PGA) Mechanism Used by Oregon's
Three Local Distribution Companies**

**MOTION FOR WAIVER OF
PGA FILING DATE**

Expedited Consideration Requested

I. INTRODUCTION

Pursuant to OAR 860-013-0031 and OAR 860-022-0070(6), Northwest Natural Gas Company ("NW Natural" or the "Company") moves for a waiver of the deadline contained in OAR 860-022-0075(6) for filing its annual purchased gas adjustment ("PGA") mechanism. For good cause shown, NW Natural respectfully requests that the Public Utility Commission of Oregon ("Commission") grant the Company's request to extend the PGA filing date from August 31, 2010 to September 2, 2010. Because the Company is scheduled to file its PGA today, NW Natural requests that the Commission consider this Motion on an expedited basis.¹

The Commission Staff supports NW Natural's request to extend the filing date to September 2, 2010.

II. DISCUSSION

Under OAR 860-22-0075(6), "[u]nless otherwise directed by the Commission, each LDC will file its annual gas cost tracking filing by August 31." The Company requests that

¹ Pursuant to OAR 860-012-0035(1)(h), the Commission has delegated to Administrative Law Judges ("ALJ") the discretion to "extend filing periods and grant waivers." Therefore, NW Natural understands that an ALJ may issue a ruling on this Motion.

1 the Commission exercise its discretion under this rule to direct NW Natural to file its PGA
2 filing by September 2, 2010.

3 The Company has been in the process of preparing its 2010 PGA for filing and
4 until Friday, August 27, 2010 had been primed to file its PGA on August 31. On
5 August 27, during a discussion with Commission Staff, NW Natural staff learned that
6 Commission Staff was requesting that beginning with the 2010 PGA, all LDCs make a
7 change to prior PGA procedures. Specifically, Staff has requested that, instead of making
8 one PGA filing, the LDCs make separate filings for each non-gas-related element of the
9 PGA deferral. Until that discussion, NW Natural had not been aware of Staff's proposed
10 changes to the 2010 PGA filing. NW Natural can revise its PGA filing in accordance with
11 Staff's request, but cannot do so before the August 31 deadline. Therefore, NW Natural
12 requests that the Commission waive the August 31 deadline for good cause shown.

13 **III. EXPEDITED CONSIDERATION**

14 Because the PGA filing deadline is today, NW Natural requests that the
15 Commission expedite its consideration of this Motion.

16
17 For the foregoing reasons, NW Natural requests that the Commission enter an
18 expedited order waiving the August 31, 2010 PGA deadline and allowing NW Natural to
19 file its 2010 PGA by September 2, 2010.

20
21 DATED: August 31, 2010

Respectfully submitted,

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23 **MCDOWELL RACKNER & GIBSON PC**

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25 _____
Lisa Rackner

26 Of Attorneys for NW Natural