

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 UM 1654

4 In the Matter of

5 NORTHWEST NATURAL GAS
6 COMPANY, dba NW NATURAL

7 Investigation of Interstate Storage and
8 Optimization Sharing

STAFF MOTION FOR LEAVE TO FILE
SUPPLEMENTAL TESTIMONY AND MODIFY
SCHEDULE

9 The Public Utility Commission of Oregon Staff (Staff) respectfully requests leave to file
10 supplemental Staff testimony and to modify the schedule in this docket. Under the current
11 schedule, Staff and the Citizens' Utility Board (CUB) filed one round of simultaneous testimony.
12 CUB's testimony includes proposals that Staff has not had the opportunity to respond to because
13 there is no currently scheduled opportunity for Staff to file testimony responding to CUB.

14 In order to meet Staff's objectives or replying to all parties' positions and to develop a
15 full and complete record for Commission review, Staff requests an opportunity to file
16 supplemental testimony. If granted leave to file such testimony, the schedule would need to be
17 modified. Staff has consulted with the other parties and no party opposes Staff's request to file
18 supplemental testimony. Furthermore, all the parties agree to the proposed schedule
19 modifications, listed below.

20 Staff requests the following schedule modification:

21 November 22, 2013: Staff supplemental testimony

22 January 10, 2014: NW Natural and CUB filing responsive testimony limited to Staff's
23 supplemental testimony on Jan 10, 2014¹

24 January 29, 2014: Prehearing Briefs

25 January 31, 2014: Cross Exam Statements and prefiled exhibits

26 ¹ 8 calendar day discovery after Jan 10, 2014.

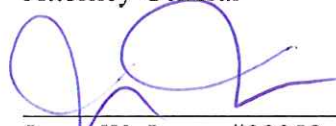
1 February 3, 2014: Hearing
2 February 21, 2014: Post Hearing Briefs due

3 For the foregoing reasons, Staff respectfully requests leave to file supplemental testimony
4 and that the schedule be modified.

5
6 DATED this 18th day of October 2013.

7 Respectfully submitted,

8 ELLEN F. ROSENBLUM
9 Attorney General

10 

11 _____
12 Jason W. Jones, #00059
13 Assistant Attorney General
14 Of Attorneys for Staff of the Public Utility
15 Commission of Oregon

1 **CERTIFICATE OF SERVICE**

2 I certify that on October 18, 2013, I served the foregoing MOTION upon all parties of
3 record in this proceeding by delivering a copy by electronic mail only as all parties waive paper
4 service.

5 **W**
6 **CABLE HUSTON BENEDICT HAAGENSEN &**
7 **LLOYD**
8 TOMMY A BROOKS
1001 SW FIFTH AVE, STE 2000
PORTLAND OR 97204-1136
tbrooks@cablehuston.com

9 **W**
10 **CABLE HUSTON BENEDICT HAAGENSEN &**
11 **LLOYD LLP**
12 CHAD M STOKES
1001 SW 5TH - STE 2000
13 PORTLAND OR 97204-1136
14 cstokes@cablehuston.com

15 **W**
16 **CITIZENS' UTILITY BOARD OF OREGON**
17 OPUC DOCKETS
18 610 SW BROADWAY, STE 400
19 PORTLAND OR 97205
20 dockets@oregoncub.org

21 ROBERT JENKS (C)
22 610 SW BROADWAY, STE 400
23 PORTLAND OR 97205
24 bob@oregoncub.org


W
CITIZENS' UTILITY BOARD OF OREGON
G. CATRIONA MCCrackEN (C)
610 SW BROADWAY, STE 400
PORTLAND OR 97205
catriona@oregoncub.org

W
MCDOWELL RACKNER & GIBSON PC
LISA F RACKNER (C)
419 SW 11TH AVE., SUITE 400
PORTLAND OR 97205
dockets@mcd-law.com

W
NORTHWEST NATURAL
E-FILING
220 NW 2ND AVE
PORTLAND OR 97209
efiling@nwnatural.com

MARK R THOMPSON (C)
220 NW 2ND AVE
PORTLAND OR 97209
mark.thompson@nwnatural.com

W
PUBLIC UTILITY COMMISSION OF OREGON
ERIK COLVILLE (C)
PO BOX 1088
SALEM OR 97308-1088
erik.colville@state.or.us

21 
22 Neoma Lane
23 Legal Secretary
24 Department of Justice
25 Business Activities Section
26