

McDowell Rackner & Gibson PC



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February 26, 2014

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97302-1088

Re: Docket UM 1654 – In the Matter of Northwest Natural Gas Company - Investigation
of Interstate Storage and Optimization Sharing

Attention Filing Center:

Enclosed for filing in the above-referenced docket is an original and one copy of Northwest
Natural Gas Company's Motion for Extension of Time.

A copy of this filing has been served on all parties to this proceeding as indicated on the
enclosed Certificate of Service.

Please contact this office with any questions.

Very truly yours,

Handwritten signature of Wendy McIndoo in blue ink.

Wendy McIndoo
Office Manager

Enclosure

cc: Service List

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

3 **UM 1654**

4
5 In the Matter of

6 PUBLIC UTILITY COMMISSION OF
7 OREGON,

8 Investigation into Interstate Storage and
9 Optimization Sharing.

**NORTHWEST NATURAL GAS
COMPANY'S
MOTION FOR EXTENSION OF TIME**

EXPEDITED CONSIDERATION
REQUESTED

10 Pursuant to OAR 860-001-0420(1) and (7) Northwest Natural Gas Company ("NW
11 Natural" or "Company") requests an extension of time to respond to the Public Utility
12 Commission of Oregon's ("Commission") bench request set forth in Administrative Law Judge
13 Shani Pines' February 21, 2014, Memorandum and Bench Request. The Company's
14 response is due on Friday, February 28, 2014. Due to the extensive analysis necessary to
15 answer the Commission's questions, the Company requests additional time to file its
16 response. The Company requests an extension to Wednesday, March 5, 2014.

17 NW Natural requests expedited consideration of this motion. Consistent with OAR
18 860-001-0420(3) and (7) NW Natural has conferred with all of the parties to this case and all
19 the parties support this motion.

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DATED: February 26, 2014.

Respectfully submitted,

MCDOWELL RACKNER & GIBSON PC



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Adam Lowney
Attorneys for NW Natural

NORTHWEST NATURAL GAS COMPANY
Mark Thompson
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in UM 1654 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

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Dated: February 26, 2014



Wendy McIndoo
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