

# McDowell Rackner & Gibson PC



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March 19, 2015

## VIA ELECTRONIC FILING

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 1088  
Salem, OR 97308-1088

Re: Dockets UM 1635 and UM 1706

Attention Filing Center:

Attached for filing in the above-captioned dockets is Northwest Natural Gas Company's Petition for Extension of Time (Expedited Consideration Requested).

Please contact this office with any questions.

Very truly yours,

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

Wendy McIndoo  
Office Manager

Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM 1635 PHASE II & UM 1706

In the Matters of  
NORTHWEST NATURAL GAS COMPANY,  
dba NW NATURAL,  
Mechanism for Recovery of Environmental  
Remediation Costs  
(UM 1635)  
and  
Request for Determination of the Prudence of  
Environmental Remediation Costs for the  
Calendar Year 2013 and the First Quarter of  
2014  
(UM 1706)

PETITION FOR EXTENSION OF TIME  
(EXPEDITED CONSIDERATION  
REQUESTED)

I. INTRODUCTION

1 In accordance with OAR 860-001-0700 and OAR 860-001-0420, NW Natural Gas  
2 Company ("NW Natural" or "the Company") files this Petition for Extension of Time to request  
3 that the deadline for the compliance filing required by Order No. 15-049 be extended to March  
4 31, 2015. Because the deadline currently specified in Order No. 15-049 is 30 days from the  
5 date of the order, or March 23, 2015, NW Natural requests expedited consideration of this  
6 petition. NW Natural has conferred with the parties to this proceeding, and no party opposes  
7 this petition.

8 Under OAR 860-001-0700(1), "any party may file a petition for extension or  
9 postponement of an effective date or time to comply with [a Commission] order" within 60  
10 days of the date of service the order. In accordance with OAR 860-001-0700(2), "the petition  
11 must specify reasons for the requested extension or postponement." For the reasons  
12 discussed further in Section II, the Company requests that the Commission extend the  
13 deadline for the compliance filing required by Order No. 15-049 until March 31, 2015.

## II. DISCUSSION

1           In Order No. 15-049, the Commission directed NW Natural to, within 30 days of the  
2           date of Order No. 15-049, "submit a filing in this docket demonstrating how it will implement  
3           both the historic and future decisions reached in this order."<sup>1</sup> The Commission also directed  
4           the Company to file a compliance tariff to implement the remediation cost rider.<sup>2</sup> The  
5           Commission issued Order No. 15-049 on February 20, 2015, and the required compliance  
6           filing would be due on March 23, 2015.

7           After issuance of Order No. 15-049, the Company immediately commenced work on  
8           the compliance filing. The Company intends to make a filing demonstrating how ratemaking  
9           will be implemented under the Site Remediation and Recovery Mechanism, the balances of  
10          the various accounts that will be used, and the details around how the Company makes the  
11          various calculations required by the Commission's order. However, due to the number and  
12          complexity of the accounting, ratemaking, associated tax issues, and other technical issues  
13          raised by the filing, the Company has determined that it requires additional time to complete  
14          the work in accordance with the Commission's order and to ensure accuracy and  
15          completeness. The Commission has previously granted a petition for extension of time to  
16          comply with an order where the company cites difficulty compiling the information necessary  
17          to make the required filing.<sup>3</sup>

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<sup>1</sup> *In the Matters of Northwest Natural Gas Company, dba NW Natural, Mechanism for Recovery of Environmental Remediation Costs and Request for Determination of the Prudence of Environmental Remediation Costs for the Calendar Year 2013 and the First Quarter of 2015*, Dockets UM 1635 and UM 1706, Order No. 15-049 at 20 (Feb. 20, 2015).

<sup>2</sup> *Id.* at 11.

<sup>3</sup> *See, e.g., In the Matter of Mill Mar Estates Water, Inc.*, Docket WJ 19, Order No. 08-432 (Aug. 26, 2008) (granting 45 day extension for company to file tariffs and compile necessary information).

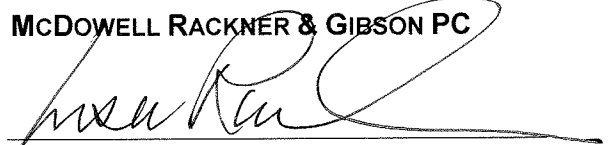
1           On March 18, 2015, NW Natural contacted the other parties to this proceeding, and  
2           determined that no party opposes this petition. NW Natural's request for an eight-day  
3           extension is unopposed, and will not significantly delay implementation of Order No. 15-049.

### III. CONCLUSION

4           NW Natural has timely requested an extension of the deadline for the compliance  
5           filing, NW Natural has specified the reasons for the requested extension, and no party  
6           opposes the Company's petition. The Company requests that the deadline for filing for the  
7           compliance filing required in Order No. 15-049 be extended to March 31, 2015, and requests  
8           expedited consideration of this petition.

DATED: March 19, 2015

**MCDOWELL RACKNER & GIBSON PC**



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