



December 4, 2013

PUC Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, OR 97302-1088

Attn: Judge Arlow

Re: UG 266 -- In the Matter of Northwest Natural Gas Company

Dear Judge Arlow:

Clean Energy objects to the request for additional rebuttal time for witness Summers of Northwest Natural Gas, as made in the letter delivered today from Lisa Rackner. We did not assert any objection this morning during the pre-hearing conference, with the understanding that the rebuttal was to be short. Ms. Rackner had represented informally to the parties when your honor was out of the room that the rebuttal would be 10 minutes in length. The request was also presented in the context of a contested hearing in which there would be cross-examination by NW Natural of Mr. Mitchell. NW Natural now seeks to shuffle the proceeding so that it has the opportunity to present additional evidence without giving Mr. Mitchell the opportunity to respond to NW Natural's questions and concerns. There had been no provision for rebuttal in your prior orders, and NW Natural should have prepared to present its case with that limitation in mind. Clean Energy will honor its agreement with Ms. Rackner, however, to allow 10 minutes of rebuttal from Ms. Summers.

In addition, Ms. Rackner has stipulated that NW Natural will not seek administrative notice of any documents provided by Clean Energy in data responses or any filings made by Clean Energy in any other jurisdiction.

Respectfully.

Donald Brookhyser
Counsel for Clean Energy

cc: service list