

McDowell Rackner & Gibson PC



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January 20, 2016

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-2148

Re: Docket No. UM 1722 –Investigation into Recovery of Safety Costs by Natural Gas Utilities

Dear PUC Filing Center:

Attached for filing in the above referenced case is an electronic copy of the Motion to Amend Procedural Schedule – Expedited Consideration Requested.

If you have any questions, please do not hesitate to contact this office.

Very truly yours,

A handwritten signature in blue ink that reads "Wendy McIndoo". The signature is fluid and cursive.

Wendy McIndoo

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UG 286 & UM 1722**

In the Matters of)) PUBLIC UTILITY COMMISSION OF) OREGON)) Investigation into Recovery of Safety Costs by) Natural Gas Utilities (UM 1722))) and)) NORTHWEST NATURAL GAS COMPANY,) dba NW NATURAL,)) Request to Continue Schedule 177, the) System Integrity Program Recovery) Mechanism (UG 286).)	MOTION TO AMEND PROCEDURAL SCHEDULE EXPEDITED CONSIDERATION REQUESTED
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Pursuant to OAR 860-001-0420, Northwest Natural Gas Company (“NW Natural” or “Company”) respectfully requests that the remainder of the schedule in this docket be amended as follows:

Event	Current Date	Amended Date
Staff and Intervenor Opening Testimony	January 28, 2016	February 8, 2016.
Settlement Conference	February 4, 2016	February 16, 2016
Commission Workshop	March 30, 2016	No Change
LDCs Reply Testimony, Staff and Intervenor Cross-Reply Testimony	April 11, 2016	No Change
All Parties Pre-hearing Briefs	TBD	April 21, 2016
Cross-Examination Statements	TBD	May 12, 2016
Hearing	TBD	May 24, 26, or 27, 2016
LDCs Post-Hearing Brief	TBD	June 13, 2016

Staff and Intervenor Response Brief	TBD	June 27, 2016
Utility Reply, Staff and Intervenor Cross-Reply	TBD	July 13, 2016

These changes are requested for the following reasons:

1. Staff and Intervenor require additional time to prepare their Opening Testimony because the utilities have requested and received extensions of time to serve responses to certain data responses;
2. The extension of time for Staff and Intervenor Opening Testimony necessitates an extension of the date for the Settlement Conference; and
3. The parties wish to replace the dates currently marked TBD with dates certain.

NW Natural has conferred with the other parties to this proceeding, and all parties support the change to the procedural schedule. NW Natural requests expedited consideration of this motion.

Dated: January 19, 2016

MCDOWELL RACKNER & GIBSON PC



Lisa F. Rackner

NORTHWEST NATURAL GAS COMPANY
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