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January 22, 2019

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
P.O. Box 1088
201 High Street SE, Suite 100
Salem, Oregon 97301

**Re: Docket No. UG 347 – Cascade Natural Gas Corporation’s Application for a
General Rate Revision.**

Attention Filing Center:

Attached for filing in the above-captioned docket is the Motion to Admit and Request for Waiver.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Wendy McIndoo'.

Wendy McIndoo
Office Manager

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 347

In the Matter of
CASCADE NATURAL GAS CORPORATION
Application for a General Rate Revision.

**MOTION TO ADMIT
STIPULATION AND REQUEST
FOR WAIVER**

1 Cascade Natural Gas Corporation (Cascade), on behalf of the parties to the Stipulation
2 filed in this docket, which include Cascade, Staff, the Oregon Citizens' Utility Board, and
3 Alliance of Western Energy Consumers (collectively, Stipulating Parties), moves for the
4 admission of the Stipulation into the record as evidence in this proceeding and requests a
5 waiver of the requirement in OAR 860-001-0350(7) that settlements between parties be
6 accompanied by joint testimony or a supporting brief when filed. Cascade has consulted with
7 the Stipulating Parties, and the Stipulating Parties support this Motion and Request for Waiver.

8 The Stipulating Parties seek to file this Stipulation to show that the Stipulating Parties
9 have resolved the issues in this docket. Additionally, the filing of the Stipulation in advance
10 of the Joint Testimony supporting the Stipulation is consistent with the Status Report filed by
11 Staff in this docket on January 15, 2019, which indicated that the Stipulating Parties
12 anticipated filing the Stipulation "within a matter of days with joint testimony to follow."

13 The Stipulating Parties have started working on the supporting testimony, although it
14 is not yet complete. The Stipulating Parties expect to complete and file the Joint Testimony
15 within a week or less. Accordingly, the Stipulating Parties ask for a waiver of the requirement
16 in OAR 860-001-0350(7) that the Stipulation be accompanied by supporting testimony at the
17 time of filing. The Stipulating Parties will submit Joint Testimony supporting the Stipulation—
18 as well as supporting affidavits and a motion to admit the Joint Testimony—following
19 completion of the Joint Testimony.

1 For the foregoing reasons, Cascade asks the ALJ to accept the Stipulation for filing
2 and waive the requirement in OAR 860-001-0350(7) that a supporting joint brief or testimony
3 be filed contemporaneously.

4 DATED this 22 day of January 2019.

MCDOWELL RACKNER & GIBSON PC

A handwritten signature in blue ink, appearing to read 'Lisa F. Rackner', written over a horizontal line.

Lisa F. Rackner
Jocelyn C. Pease

Attorneys for Cascade