

ALISHA TILL Direct (503) 290-3628 alisha@mrg-law.com

March 12, 2020

## **VIA ELECTRONIC FILING**

Attention: Filing Center Public Utility Commission of Oregon P.O. Box 1088 Salem, Oregon 97308-1088

Re: UG 388 – NW Natural Request for a Rate Revision.

Attention Filing Center:

Attached for filing in the above-referenced docket is a copy of Northwest Natural Gas Company's Motion to Admit the Stipulation and Request for Waiver.

Sincerely,

/s/ Alisha Till

Alisha Till Paralegal

Attachment

## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

**UG 388** 

In the Matter of

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

time of filing.

NW NATURAL GAS COMPANY D/B/A NW NATURAL

Request for a General Rate Revision.

## MOTION TO ADMIT STIPULATION AND REQUEST FOR WAIVER

Concurrently with this Motion and Request for Waiver, Northwest Natural Gas Company (NW Natural) is filing a stipulation reflecting the agreement of all parties to this case—NW Natural, Staff of the Public Utility Commission of Oregon, the Oregon Citizens' Utility Board, and Alliance of Western Energy Consumers (collectively, Stipulating Parties) regarding cost of capital issues (Stipulation). Accordingly, NW Natural, on behalf of the Stipulating Parties, requests that the Administrative Law Judge issue a ruling admitting the Stipulation into the record as evidence in this proceeding, and further requests a waiver of the requirement in OAR 860-001-0350(7) that settlements between parties be accompanied by joint testimony or a supporting brief when filed. NW Natural has consulted with the Stipulating Parties, and the Stipulating Parties support this Motion and Request for Waiver. The Stipulating Parties seek to file this Stipulation immediately, in order to notify the Commission and interested parties that the Stipulating Parties have resolved cost of capital issues raised in this docket. The Stipulating Parties plan to file testimony supporting the Stipulation on April 21, 2020—which is two business days after Staff and Intervenor Response testimony is due. Accordingly, the Stipulating Parties ask for a waiver of the requirement in OAR 860-001-0350(7) that the Stipulation be accompanied by supporting testimony at the

- 1 For the foregoing reasons, NW Natural 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 12th day of March 2020.

McDowell Rackner Gibson PC

Lisa F. Rackner Jocelyn Pease

McDowell Rackner Gibson PC 419 SW 11<sup>th</sup> Ave., Suite 400

Portland, OR 97205 503-595-3925

dockets@mrg-law.com

Attorneys for Northwest Natural Gas Company