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May 31, 2022

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
P.O. Box 1088  
201 High Street SE, Suite 100  
Salem, Oregon 97308-1088

**Re: Consolidated UG 435 / UG 411 / Application of NW Natural for a General Rate Revision / Schedule 198 Renewable Natural Gas Recovery.**

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 a Waiver.

Please contact this office with any questions.

Sincerely,

Suzanne Prinsen  
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UG 435 AND UG 411**

In the Matter of

NW NATURAL GAS COMPANY D/B/A  
NW NATURAL

Request for a General Rate Revision (UG  
435), and

Advice 20-19, Schedule 198 Renewable  
Natural Gas Recovery Mechanism (ADV  
1215) (UG 411).

**MOTION TO ADMIT MULTI-PARTY  
STIPULATION AND REQUEST FOR  
WAIVER**

1           Concurrently with this Motion and Request for Waiver, Northwest Natural Gas  
2 Company (“NW Natural”) is filing a multi-party stipulation reflecting the agreement of  
3 certain parties to this case—NW Natural, Staff of the Public Utility Commission of Oregon,  
4 the Oregon Citizens’ Utility Board, the Alliance of Western Energy Consumers, and the  
5 Small Business Utility Advocates (collectively, the “Stipulating Parties”)—regarding  
6 revenue requirement, rate spread and certain other issues (“Stipulation”).<sup>1</sup> Accordingly,  
7 NW Natural, on behalf of the Stipulating Parties, requests that the Administrative Law  
8 Judge issue a ruling admitting the Stipulation into the record as evidence in this  
9 proceeding, and further requests a waiver of the requirement in OAR 860-001-0350(7)  
10 that settlements between parties be accompanied by joint testimony or a supporting brief

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<sup>1</sup> The Stipulation will address all issues among the Stipulating Parties, except for those that are listed in Paragraph 14 of the Stipulation that will continue to be litigated in these consolidated cases or, pending additional settlement discussions, may be incorporated into a separate stipulated agreement entered into at a later date.

1 when filed. NW Natural has consulted with the Stipulating Parties, and the Stipulating  
2 Parties support this Motion and Request for Waiver.

3 The Stipulating Parties seek to file this Stipulation immediately, in order to notify  
4 the Commission and interested parties that the Stipulating Parties have resolved issues  
5 concerning revenue requirement, rate spread and certain other issues raised in this  
6 docket. The Stipulating Parties plan to file testimony supporting the Stipulation on or  
7 around Wednesday, June 8, 2022. Accordingly, the Stipulating Parties ask for a waiver  
8 of the requirement in OAR 860-001-0350(7) that the Stipulation be accompanied by  
9 supporting testimony at the time of filing.

10 For the foregoing reasons, NW Natural asks the ALJ to accept the Stipulation for  
11 filing and waive the requirement in OAR 860-001-0350(7) that a supporting joint brief or  
12 testimony be filed contemporaneously.

13 DATED this 31st day of May 2022.

**McDOWELL RACKNER GIBSON PC**



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