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November 7, 2005

VIA ELECTRONIC FILING

Oregon Public Utility Commission
Attn: Filing Center
550 Capitol Street, N.E., #215
P.O. Box 2148
Salem, Oregon 97308-2148

RE: In the Matter of the Petition of Northwest Natural Gas Company for a Declaratory Ruling Pursuant to ORS 756.450 Regarding whether Joint Bypass by Two or More Industrial Customers Violates ORS 758.400 *Et Seq.*
Docket No. DR-23

Dear Filing Center:

Enclosed please find an original and three (3) copies of a **Stipulated Motion** in the above-referenced Docket.

The Stipulated Motion was filed electronically on this date, and served via e-mail on Administrative Law Judge Christina Smith, and on all parties who provided e-mail addresses on the OPUC website. Additionally, a paper copy will be served on all parties listed on the OPUC website's current Service List.

Thank you for your assistance.

Respectfully submitted,



Chad M. Stokes

EAF/nh

cc: Administrative Law Judge Christina Smith
Current Service List

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

DR 23

In the Matter of the Petition of Northwest)
Natural Gas Company For a Declaratory)
Ruling Pursuant to ORS 756.450)
Regarding Whether Joint Bypass by Two)
or More Industrial Customers Violates)
ORS 758.400 *Et Seq.* .)


STIPULATED MOTION


Wah Chang and Northwest Natural Gas Company (“NW Natural”) move the Oregon Public Utility Commission for an extension of time to file a response brief. The requested change is to extend the time for response briefs from November 10, 2005 to December 8, 2005. The extension is requested to allow time for continued settlement discussions between the parties. In particular, Wah Chang and NW Natural believe they are close to reaching a settlement. The outcome of these settlement negotiations might impact the remand proceedings. This is the second request for an extension of time. Staff and the Northwest Industrial Gas Users have no objection to this request. Counsel for Oregon Steel Mills could not be reached.

DATED this 7th day of November, 2005.

PRESTON GATES & ELLIS LLP

CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD LLP

By: 
for Timothy J. Sercombe, OSB # 76331
Attorneys for Petitioner
Northwest Natural Gas Company

By: 
Edward A. Finklea, OSB # 84216
Chad M. Stokes, OSB #00400
Attorneys for Intervenors
Wah Chang and NWIGU

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused to be served the foregoing **STIPULATED MOTION** on the attached Service List obtained on November 7, 2005 from the Oregon Public Utility Commission's Website:

[XX] by **MAILING** a full, true and correct copy thereof in a sealed, postage-paid envelope, addressed as shown on the attached Service List, and deposited with the U.S. Postal Service at Portland, Oregon, on the date set forth below;

[XX] **and** by **electronic mail** ("e-mail") to those parties on the Oregon Public Utility Commission's Website Service List who listed an e-mail address.

SERVICE LIST (Parties)

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DATED: November 7, 2005.



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