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December 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 (“Commission”) for an additional extension of time to file a response brief. The requested change is to extend the time for response briefs from December 8, 2005 to January 18, 2006.

Wah Chang and NW Natural have agreed upon settlement terms and are executing a settlement agreement that they believe resolves DR 23. As a result, NW Natural will be filing a motion to dismiss the proceeding. The additional time for briefing will allow other parties to comment on the dismissal, if necessary, and also allow for any additional process required by the Commission. This is the third request for an extension of time. Commission Staff, Oregon Steel Mills and the Northwest Industrial Gas Users have no objection to this request.

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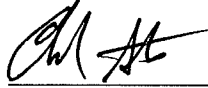
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PAGE 1—STIPULATED MOTION

DATED this 7th day of December, 2005.

PRESTON GATES & ELLIS LLP

By: 

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

CABLE HUSTON BENEDICT
HAAGENSEN & LLOYD LLP

By: 

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

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CERTIFICATE OF SERVICE

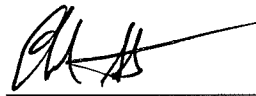
I HEREBY CERTIFY that I caused to be served the foregoing **STIPULATED MOTION** on the attached Service List obtained on December 7, 2005 from the Oregon Public Utility Commission's Website:

| <u>ACTIONS</u> | <u>SERVICE LIST (Parties)</u> | <u>SCHEDULE</u> |
|---|---|-----------------|
| RATES & REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES & REGULATORY AFFAIRS 121 SW SALMON ST 1WTC0702 PORTLAND OR 97204 pge.opuc.filings@pgn.com | MELINDA J DAVISON DAVISON VAN CLEVE PC 333 SW TAYLOR - STE 400 PORTLAND OR 97204 mail@dvclaw.com | |
| JIM DEASON 521 SW CLAY ST STE 107 PORTLAND OR 97201-5407 jimdeason@comcast.net | JAMES DENHAM OREMET WAH CHANG PO BOX 460 ALBANY OR 97321 jim.denham@wahchang.com | |
| EDWARD A FINKLEA CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP 1001 SW 5TH - STE 2000 PORTLAND OR 97204 efinklea@chbh.com | J RICHARD GEORGE PORTLAND GENERAL ELECTRIC COMPANY 121 SW SALMON ST PORTLAND OR 97204 richard.george@pgn.com | |
| JASON W JONES DEPARTMENT OF JUSTICE REGULATED UTILITY & BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 jason.w.jones@state.or.us | ELISA M LARSON NORTHWEST NATURAL 220 NW 2ND AVE PORTLAND OR 97209 elisa.larson@nwnatural.com | |
| C ALEX MILLER NORTHWEST NATURAL 220 NW 2ND AVE PORTLAND OR 97209 alex.miller@nwnatural.com | PAULA E PYRON NORTHWEST INDUSTRIAL GAS USERS 4113 WOLF BERRY COURT LAKE OSWEGO OR 97035-1827 ppyron@nwigu.org | |
| JERRY RICHARTZ OREGON STEEL MILLS INC PO BOX 2760 PORTLAND OR 97208 | TIMOTHY SERCOMBE PRESTON/GATES/ELLIS LLP 222 SW COLUMBIA ST STE 1400 PORTLAND OR 97201-6632 tsercomb@prestongates.com | |

[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.

DATED: December 7, 2005.



CHAD M. STOKES, OSB No. 00400

PAGE 2—CERTIFICATE OF SERVICE

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