BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UG 152

In The Matter of the Application of Northwest Natural Gas Company For a General Rate Revision UNOPPOSED MOTION TO EXTEND TIME FOR FILING WARM REPORT

Pursuant to OAR 860-013-0031, Northwest Natural Gas Company ("NW Natural" or the "Company") requests that the administrative law judge issue an order in the above-captioned docket extending the due date from September 30, 2005, to October 31, 2005 for the Company's submittal of a report regarding the functioning of its weather-adjusted rate mechanism ("WARM") program.

In Order No. 03-507, issued on August 22, 2003, the Public Utility Commission of Oregon (the "Commission"), among other things, adopted in its entirety the Partial Stipulation Regarding the Weather-Adjusted Rate Mechanism (WARM), dated August 4, 2005 (the "Partial Stipulation"). Section 6(b) of the Partial Stipulation requires the Company to submit to the Commission a report on the functioning of WARM, including any proposed refinements to the program (the "WARM Report"), two years following WARM implementation, by September 30, 2005.

In connection with the Company's obligation to submit the WARM Report to the Commission, the Company engaged an independent consultant, Christensen Associates Energy Consulting, LLC ("Consultant"), to provide a comprehensive review and written evaluation of the WARM program. The Consultant only recently, on September 21, provided its report to the Company. That report contains numerous factual comments and certain recommendations regarding modifications to the WARM program. On the basis of the Company's initial review of the Consultant's report, the Company believes that more time is required in order to adequately study and comprehensively evaluate the Consultant's report, including the Consultant's

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suggested changes to the WARM program. While the Company does not at this time expect that

it will propose to incorporate Consultant's recommended modifications to the WARM program,

the Company has asked the Consultant for more information about the Consultant's proposals

and is awaiting the Consultant's response. By extending the deadline for filing of the WARM

Report, the Company will be able to provide a more complete WARM Report to the

Commission.

The Company has notified all parties to the Partial Stipulation of its intention to file this

Motion, and all of the parties have either expressly agreed or have not notified the Company of

their objection to the Company's request for an extension of time to October 31, 2005, for filing

of the WARM Report.

Due to the short time frame, the Company respectfully requests expedited treatment by

the Commission of this Motion. In the event the Commission does not issue an order extending

the due date for submittal of the WARM Report, the Company will endeavor to make a filing of

the WARM Report, in its current form, by September 30, 2005.

CONCLUSION

For the foregoing reasons, NW Natural respectfully asks that the administrative law judge

issue an order extending the deadline for filing by the Company of the WARM Report from

September 30, 2005, to October 31, 2005.

DATED this 28th day of September, 2005.

Respectfully submitted,

NORTHWEST NATURAL

GAS COMPANY

/s/ Elisa M. Larson

Elisa M. Larson

Associate Counsel

cc: UG 152 Service List

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CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing STIPULATED MOTION TO EXTEND TIME FOR FILING WARM REPORT upon all parties of record in this proceeding by electronically mailing a copy to the following parties or attorneys of parties:

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DATED at Portland, Oregon, this 28th day of September, 2005.

__/<u>s/ Kelley C. Miller</u>_

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