

H
CABLE HUSTON
CABLE HUSTON BENEDICT HAAGENSEN & LLOYD LLP ■ ATTORNEYS

TOMMY A. BROOKS
ADMITTED IN OREGON AND WASHINGTON

tbrooks@cablehuston.com
www.cablehuston.com

August 24, 2012

**VIA ELECTRONIC FILING
& U.S. MAIL**

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 Northwest Natural Gas Company –
Application for a General Rate Revision
Docket No. UG-221

Dear Filing Center:

Enclosed please find an original and one (1) copy of Northwest Industrial Gas Users' Motion to Admit Pre-filed Testimony.

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,



Tommy A. Brooks

TAB:
Enclosures

cc: UG 221 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 221

In the Matter of)
) NORTHWEST INDUSTRIAL GAS
NORTHWEST NATURAL GAS) USERS' MOTION TO ADMIT PRE-
COMPANY) FILED TESTIMONY
)
Application for a General Rate Revision)
)

MOTION

Northwest Industrial Gas Users ("NWIGU") requests admission of the following pre-filed testimony into the record in this matter: 1) Exhibits NWIGU/101-103; 2) Exhibit NWIGU/200; 3) Exhibits NWIGU-CUB/100-101; and 4) Exhibit NWIGU-CUB/200. This motion is based on the affidavits of Donald W. Schoenbeck and Hugh Larkin, Jr., both of which were filed with the Commission on August 22, 2012. NWIGU jointly sponsored Exhibits NWIGU-CUB/100-101 and NWIGU-CUB/200 with the Citizens' Utility Board of Oregon, which supports the admission of those exhibits into the record.

Dated this 24th day of August 2012.

Respectfully submitted,



Chad M. Stokes, OSB No. 004007
Tommy A. Brooks, OSB No. 076071
Cable Huston
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for the
Northwest Industrial Gas Users

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing ***NWIGU'S MOTION TO ADMIT PRE-FILED TESTIMONY*** via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

NW Natural

Mark R. Thompson
220 NW Second Avenue
Portland, OR 97209
mark.thompson@nwnatural.com

NW Natural – E-Filing

220 NW Second Avenue
Portland, OR 97209
efiling@nwnatural.com

Citizens Utility Board

OPUC Dockets
610 SW Broadway, Suite 400
Portland, OR 97205
dockets@oregoncub.org

Citizens Utility Board

Robert Jenks
610 SW Broadway, Suite 400
Portland, OR 97205
bob@oregoncub.org

Citizens Utility Board

G. Catriona McCracken
610 SW Broadway, Suite 400
Portland, OR 97205
catriona@oregoncub.org

McDowell, Rackner & Gibson

Lisa Rackner
419 SW 11th Avenue, Suite 400
Portland OR 97205
lisa@mcd-law.com

Department of Justice

Jason Jones
Business Activities Section
1162 Court ST NE
Salem, OR 97301-4096
jason.w.jones@state.or.us

Public Utility Commission

Judy Johnson
P.O. Box 2148
Salem, OR 97308-2148
judy.johnson@state.or.us

NW Energy Coalition

Wendy Gerlitz
1205 SE Flavel
Portland, OR 97202
wendy@nwenergy.org

Community Action Partnership of Oregon

Jess Kincaid
PO Box 7964
Salem, OR 97301
jess@caporegon.org

Northwest Pipeline GP

Jane Harrison
295 Chipeta Way
Salt Lake City, UT 84108
jane.f.harrison@williams.com

Northwest Pipeline GP

Stewart Merrick
295 Chipeta Way
Salt Lake City, UT 84108
stewart.merrick@williams.com

Portland General Electric
Randy Dahlgren
121 SW Salmon Street – 1WTC0702
Portland, OR 97204
Pge.opuc.filings@pgn.com

Portland General Electric
Douglas C. Tingey
121 SW Salmon Street – 1WTC13
Portland, OR 97204
Doug.tingey@pgn.com

Dated in Portland, Oregon, this 24th day of August 2012.



Chad M. Stokes, OSB No. 004007
Tommy A. Brooks, OSB No. 076071
Cable Huston Benedict Haagensen & Lloyd
1001 SW Fifth Ave., Suite 2000
Portland, OR 97204-1136
Telephone: (503) 224-3092
Facsimile: (503) 224-3176
E-Mail: cstokes@cablehuston.com
tbrooks@cablehuston.com

Of Attorneys for the
Northwest Industrial Gas Users