



Citizens' Utility Board of Oregon

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July 19, 2013

Commissioners Ackerman, Savage and Bloom
Oregon Public Utility Commission
PO Box 2148
Salem OR 97308-2148

Re: LC51 - 2012 Integrated Resource Plan Update: CUB's Comments In Support of Suspension of the Procedural Schedule and Closure of the Docket

Dear Commissioners Ackerman, Savage and Bloom:

NW Natural filed its 2012 LC 51 Integrated Resource Plan (IRP) Update on April 25, 2013. The Update as filed requested the "Commission's acknowledgment of this update and specifically of newly revised Action Item 2.3."¹ Action Item 2.3 stated as follows:

Continue to perform further analysis on the costs, benefits and risks associated with the development of a cross-Cascades pipeline. Support the development of a regional cross-Cascades pipeline from a reliability risk management standpoint and to diversify the current resource portfolio. Negotiate and sign an acceptable Precedent Agreement with the cross-Cascades pipeline sponsors for Commission review and approval. Proceed with participation in the project as a shipper depending on the results of the open season.²

On July 11, 2013, the parties gathered for a workshop at which CUB expressed its concern that the Company had failed to provide sufficient analysis to support its request for acknowledgement. CUB further advised that CUB would not support the Company's request for acknowledgement in this truncated Update filing. CUB encouraged the Company to withdraw its request for acknowledgement at this time and to allow the issues raised by this 2013 Update to be addressed in the full 2014 IRP filing when there would be adequate time for review of the Company's proposals. CUB also encouraged the Company to permit parties to submit additional data requests to enable parties to prepare for the 2014 IRP filing and the Company has agreed to accept such data requests from the parties and not to object should the parties later seek to have such data responses entered into evidence in the 2014 IRP. Simultaneous with this filing CUB is submitting its data requests to NW Natural.

¹ NW Natural's 2013 Annual Update at 5.

² NW Natural's 2013 Annual Update at 35 (*emphasis in original*)

July 19, 2013

Commissioners Ackerman, Savage and Bloom

RE: LC51 - 2012 Integrated Resource Plan Update: CUB's Comments In Support of Suspension of the Procedural Schedule and Closure of the Docket

CUB wishes to thank NW Natural for agreeing to the continuation of the data request process and to also to thank NW Natural for its subsequent, July 16, 2013, Amended filing withdrawing its prior request for acknowledgment. It is CUB's opinion that both the Company and its customers, will be better served by all parties, and the Commission, having a full opportunity to review the meaty issues raised in this truncated IRP update in the full 2014 IRP process.

CUB supports the Company's request to amend its IRP filing to remove all references to the Company's request for Commission acknowledgment of its IRP Update. CUB also supports the Company's request that the schedule be suspended (with the caveat that CUB expects the Company to honor its agreement to answer CUB's data requests). CUB further supports the request that the docket be closed with the understanding that NW Natural will not object to data responses obtained in this docket being submitted into the record in the future 2014 IRP docket.

Finally, CUB wishes the Commission to take note of the fact that by agreeing to the suspension of this schedule, and the closure of this docket, CUB is not in any way stating its agreement with any of the materials submitted by NW Natural, or positions taken by NW Natural in its 2012 IRP Update filing including NW Natural's positions taken in regard to *Action Item 2.3, reliability and new scoping criteria*.³

Respectfully submitted,



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cc. Service List

³ NW Natural's 2013 Annual Update at 5 et seq.

LC 51 – CERTIFICATE OF SERVICE

I hereby certify that, on this 19th day of July, 2013, I served the foregoing **2012 IRP UPDATE: CUB’S COMMENTS IN SUPPORT OF SUSPENSION OF THE PROCEDURAL SCHEDULE AND CLOSURE OF THE DOCKET** in docket LC 51 upon each party listed in the LC 51 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending one original and one copy by U.S. mail, postage prepaid, to the Commission’s Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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LC 51 - Certificate of Service 2012 IRP UPDATE: CUB’S COMMENTS IN SUPPORT OF SUSPENSION OF THE PROCEDURAL SCHEDULE AND CLOSURE OF THE DOCKET

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sommer Templet". The signature is written in a cursive, flowing style.

Sommer Templet, OSB #105260
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