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January 9, 2012

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
550 Capitol Street, NE, Suite 215
Post Office Box 2148
Salem, Oregon 97308-2148

Attn: Filing Center

Re: **LC 51** – Motion to Modify Schedule

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”) herein files the attached Motion to Modify Schedule in LC 51, NW Natural’s 2011 Integrated Resource Plan.

Attached is a Certificate of Service demonstrating that this filing was served to parties on the LC 51 service list.

If you have any questions please contact me.

Sincerely,

/s/ Mark R. Thompson

Mark R. Thompson
Regulatory Affairs

attachments

cc: LC 51 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 51

In the Matter of
Northwest Natural Gas Company's,
dba NW Natural,
Integrated Resource Plan (IRP)

**MOTION TO MODIFY
SCHEDULE**

MOTION

As described more fully below, Northwest Natural Gas Company, dba NW Natural ("NW Natural" or "Company") respectfully requests that the schedule in LC 51 be modified, to allow the Company, Commission Staff, and other interested parties time to determine whether an agreeable resolution of the issues raised during the comment period of this docket can be reached. The Company believes that an extension of the schedule may assist the Commission's review of its modified 2011 Integrated Resource Plan ("2011 IRP") by giving an opportunity for some or all of the parties to support acknowledgement of the plan with certain modifications. Absent an extension of time, the Company will not be able to explore this option before Staff's Final Recommendations and Final Draft Order are filed on January 9, 2012.

Staff has indicated that it supports this motion. CUB has stated that it opposes the motion.

BACKGROUND

On January 12, 2011, NW Natural filed its 2011 IRP with the Commission. Through agreement of the parties, a schedule was proposed and adopted at the prehearing conference in this docket on February 24, 2011. Subsequently, certain parties requested that NW Natural modify its IRP to take into account certain changed circumstances, including the withdrawal of an application for the construction of the Palomar pipeline. NW Natural agreed, and on April 5, 2011 filed a motion to suspend the procedural schedule. The motion was adopted, and NW Natural then filed its modified 2011 IRP on September 1, 2011, in accordance with a revised schedule agreed to by the parties.

22 After NW Natural's modified 2011 IRP was filed, CUB, Staff, and the Company filed
23 multiple rounds of comments and reply comments. In their comments, Staff and CUB have each
24 recommended that NW Natural's modified 2011 IRP not be acknowledged, and that the
25 Company be required to do more analysis. *See, e.g. Staff's Draft Recommendations* (Dec. 8,
26 2011); *CUB's Comments on Draft Recommendations* (Dec. 23, 2011). In its most recent
27 comments, the Company explained its position that acknowledgement of the modified 2011 IRP
28 was appropriate, and that Staff and CUB may have misperceived the scope of the Company's
29 requested acknowledgement. *See NW Natural's Reply Comments* (Dec. 22, 2011).

30 On Thursday, January 5th, representatives of Staff and the Company discussed that there
31 may be a way to resolve Staff's concerns about NW Natural's request, and that some additional
32 time in the schedule would allow them the opportunity to determine whether a joint
33 recommendation to the Commission would be possible. For this purpose, the Company is now
34 requesting that the schedule in this proceeding be modified. Staff and the Company will seek to
35 work with CUB to determine whether CUB's concerns can be resolved as well.

36 The following schedule is proposed, which effects an approximately one month extension
37 to the current remainder of the schedule:

EVENT	DATE
Staff's Final Recommendations and Final Draft Order Due	February 10, 2012
Public Meeting	On or around March 13, 2012

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RELIEF REQUESTED

For all of the reasons described above, NW Natural respectfully requests an order modifying the current schedule as shown above.

DATED this 9th day of January 2012.

Respectfully Submitted,

/s/ Mark R. Thompson

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of January 2012, I served the foregoing Motion to Modify the Schedule in Docket LC 51 upon each party listed below by electronic mail.

LC 51

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DATED at Portland, Oregon, this 9th day of January 2012

/s/ Kelley Miller

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