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April 22, 2014

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
3930 Fairview Industrial Drive SE
Post Office Box 1088
Salem, Oregon 97308-1088

Attn: Filing Center

Re: LC ___, In the Matter of Northwest Natural Gas Company, 2014 Integrated Resource Plan

In accordance with the provision provided in OAR 860-027-0000(2), Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), submits the enclosed motion to request that the filing due date for its 2014 Integrated Resource Plan (“IRP”) be extended from May 9, 2014, to August 29, 2014 and to request a waiver from OAR 860-027-0400(3).

Attached is a Certificate of Service verifying that this application has been sent to all parties who participated in the Company’s most recently completed general rate case, UG 221.

If you have any questions regarding this application, please call Jennifer Gross at (503) 226-4211, extension 3590.

Sincerely,

NW NATURAL

/s/ Mark R. Thompson

Mark R. Thompson
Manager, Rates and Regulatory Affairs

attachment

cc: UG 221 Service List

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC ____

In the Matter of

NORTHWEST NATURAL GAS
COMPANY'S

2014 Integrated Resource Plan

**MOTION FOR EXTENSION
OF TIME TO FILE INTEGRATED
RESOURCE PLAN AND FOR
WAIVER OF OAR 860-027-0400(3)**

1 I. Pursuant to OAR 860-027-0000(2), Northwest Natural Gas Company, dba NW Natural
2 ("NW Natural" or the "Company") respectfully requests the Public Utility Commission of Oregon
3 ("Commission") extend the filing due date for the Company's Integrated Resource Plan ("IRP")
4 from May 9, 2014, to August 29, 2014; and requests a waiver from OAR 860-027-0400(3).

5 Please direct all correspondence regarding this Motion to the following:

6 Jennifer Gross
7 Tariff and Regulatory Compliance Consultant
8 NW Natural
9 220 NW Second Avenue
10 Portland, Oregon 97209
11 jgg@nwnatural.com
12

13 Tamy Linver
14 Director of Strategic Planning
15 NW Natural
16 220 NW Second Avenue
17 Portland, Oregon 97209
18 tsl@nwnatural.com
19

20 II. OAR 860-027-0400(3) states, "An energy utility must file an IRP within two years of its
21 previous IRP acknowledgment order or as otherwise directed by the Commission." NW
22 Natural's last filed IRP was acknowledged in Order No. 12-161 issued in Docket No. LC 51 on

1 May 9, 2011. Division 27 rules require that the Company file its next IRP no later than May 9,
2 2014.

3 In accordance with the waiver provisions provided in OAR 860-027-0000(2), NW Natural
4 herein respectfully requests that its IRP due date be extended from May 9, 2014, to August 29,
5 2014, to allow NW Natural the additional time to perform further in-depth analysis of potential
6 interstate pipeline alternatives. In particular, the Company will assess the Pacific Connector
7 pipeline as an alternative. This will include analysis of the impacts the associated export LNG
8 projects may have on prices and basis differentials, Jordan Cove for Pacific Connector and
9 Oregon LNG for Washington Expansion. The Company will also provide an independent
10 assessment of the reasonability of the cost and rate estimates received from the respective
11 pipeline sponsors being used in the 2014 IRP analysis.

12 The Company has been working on its 2014 IRP since the first quarter of 2013 and has
13 been speaking with interested parties about its work since August of 2013. To date, the
14 Company has hosted six technical working meetings, has provided interested parties with a
15 draft IRP, and has solicited comments on its draft. The comments received from Commission
16 Staff, Citizens' Utility Board of Oregon ("CUB"), Washington Utilities and Transportation
17 Commission ("WUTC") Staff, and Northwest Industrial Gas User ("NWIGU") consistently stated
18 the Company needed to provide more analysis of other options to the Cross-Cascades pipeline.

19 At its April 3, 2014, technical working group meeting, the Company proposed filing its
20 IRP by the May 9, 2014 due date and later filing a supplement that would include additional
21 analysis of the other regional pipeline projects. Parties discussed this and in general, agreed
22 that it would be preferable to have the Company seek an extended filing due date to allow all
23 the analysis performed and an assessment of it to be included in the final IRP. Parties
24 expressed concern with reviewing an IRP filed May 9, 2014, when the conclusions may change
25 due to the additional analysis that would be provided a few months later.

26 On April 18, 2014, NW Natural emailed parties to present the proposal put forth in this
27 Motion. No party objected to either extending the IRP filing due date to August 29, 2014, or to
28 the scope of additional analysis that will be performed with the added time.

1 III. It was for the reasons stated above that NW Natural is requesting the Commission to
2 extend the IRP filing deadline from May 9, 2014, to August 29, 2014, and to request a waiver
3 from OAR 860-027-0400(3). The Company believes this request is beneficial to parties
4 participating in its 2014 IRP process and to the general public.

5 DATED this 22nd day of April 2014.

6

7

/s/ Mark R. Thompson

8

Mark R. Thompson

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Manager, Rates & Regulatory Affairs

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NW Natural

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220 NW Second Avenue

12

Portland, Oregon 97209

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Phone: (503) 721-2476

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Facsimile: (503) 721-2516

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Email: mark.thompson@nwnatural.com

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing MOTION FOR EXTENSION OF 2014 INTEGRATED RESOURCE PLAN FILING DATE AND WAIVER OF OAR 860-027-00400(3), upon each party listed on the UG 221 Service List by electronic mail.

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DATED at Portland, Oregon, this 22nd of April, 2014

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