

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UG 435 AND UG 411

In the Matter of

NW NATURAL GAS COMPANY D/B/A
NW NATURAL

Request for a General Rate Revision (UG 435),
and

Advice 20-19, Schedule 198 Renewable
Natural Gas Recovery Mechanism (ADV
1215) (UG 411).

**MOTION TO ADMIT THIRD PARTIAL
STIPULATION AND REQUEST FOR
WAIVER**

Concurrently with this Motion and Request for Waiver, Alliance of Western Energy Consumers (“AWEC”) is filing a third partial stipulation reflecting the agreement of certain parties to this case—Northwest Natural Gas Company d/b/a NW Natural (“NW Natural”), Staff of the Public Utility Commission of Oregon, the Oregon Citizens’ Utility Board, and AWEC (collectively, the “Stipulating Parties”)— regarding certain issues surrounding the Lexington Renewable Natural Gas Project (“Lexington RNG Project”) with the exception of rate spread (“Third Stipulation”).¹ The Small Business Utility Advocates (“SBUA”) and the Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper, Oregon Environmental Council, Community Energy Project, and Sierra Club (collectively “Coalition”) are also parties to these consolidated proceedings. SBUA neither joins nor opposes this Third Stipulation. The

¹ The Third Stipulation will address all remaining issues among the Stipulating Parties, except for those that are listed in Paragraph 2 of the Third Stipulation that will continue to be litigated in these consolidated cases or, pending additional settlement discussions, may be incorporated into a separate stipulated agreement entered into at a later date.

Coalition takes no position on the stipulation and reserves the arguments regarding the Lexington RNG Project raised in its testimony and briefing.

Accordingly, AWEC, on behalf of the Stipulating Parties, requests that the Administrative Law Judge issue a ruling admitting the Third Stipulation into the record as evidence in this proceeding, and further requests a waiver of the requirement in OAR 860-001-0350(7) that settlements between parties be accompanied by joint testimony or a supporting brief when filed. AWEC has consulted with the Stipulating Parties, and the Stipulating Parties support this Motion and Request for Waiver.

The Stipulating Parties seek to file the Third Stipulation immediately, in order to notify the Commission and interested parties that the Stipulating Parties have resolved issues concerning the Lexington RNG Project with the exception of rate spread raised in this docket. The Stipulating Parties plan to file additional support for the Third Stipulation on or around Tuesday, August 23, 2022. Accordingly, the Stipulating Parties ask for a waiver of the requirement in OAR 860-001-0350(7) that the Third Stipulation be accompanied by supporting testimony at the time of filing.

For the foregoing reasons, AWEC asks the ALJ to accept the Third Stipulation for filing and waive the requirement in OAR 860-001-0350(7) that a supporting joint brief or testimony be filed contemporaneously.

DATED this 19th day of August 2022.

Respectfully submitted,

s/ Chad M. Stokes

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