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June 29, 2022

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
Filing Center  
P.O. Box 1088  
201 High Street SE, Suite 100  
Salem, Oregon 97308-1088

**Re: Consolidated UG 435 / UG 411 / Application of NW Natural for a General Rate Revision / Schedule 198 Renewable Natural Gas Recovery.**

Attention Filing Center:

Attached for filing in the above-referenced docket is Northwest Natural Gas Company's Motion to Admit the Second Partial Stipulation and Request for a Waiver.

Please contact this office with any questions.

Sincerely,

Alisha Till  
Paralegal

Attachment

**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 SECOND PARTIAL  
STIPULATION AND REQUEST FOR  
WAIVER**

1            Concurrently with this Motion and Request for Waiver, Northwest Natural Gas  
2 Company (“NW Natural”) is filing a second partial stipulation reflecting the agreement of  
3 certain parties to this case—NW Natural, Staff of the Public Utility Commission of Oregon,  
4 the Oregon Citizens’ Utility Board, the Alliance of Western Energy Consumers, and the  
5 Coalition of Communities of Color, Climate Solutions, Verde, Columbia Riverkeeper,  
6 Oregon Environmental Council, Community Energy Project, and Sierra Club (collectively,  
7 the “Stipulating Parties”)—regarding decoupling, residential customer deposits, the  
8 Oregon Low Income Energy Efficiency Program, and COVID-19 deferral costs (“Second  
9 Stipulation”).<sup>1</sup> The Small Business Utility Advocates is also a party to these consolidated  
10 proceedings, but does not join the Second Stipulation. Accordingly, NW Natural, on

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<sup>1</sup> The Second Stipulation will address all remaining issues among the Stipulating Parties, except for those that are listed in Paragraph 5 of the Second 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.

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

7       The Stipulating Parties seek to file this Second Stipulation immediately, in order to  
8 notify the Commission and interested parties that the Stipulating Parties have resolved  
9 issues concerning decoupling, residential customer deposits, the Oregon Low Income  
10 Energy Efficiency Program, and COVID-19 deferral costs raised in this docket. The  
11 Stipulating Parties plan to file testimony supporting the Second Stipulation on or around  
12 Thursday, July 7, 2022. Accordingly, the Stipulating Parties ask for a waiver of the  
13 requirement in OAR 860-001-0350(7) that the Stipulation be accompanied by supporting  
14 testimony at the time of filing.

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

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DATED this 29th day of June 2022.

**McDOWELL RACKNER GIBSON PC**



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