

TOMMY A. BROOKS

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April 27, 2011

VIA ELECTRONIC FILING & FIRST CLASS MAIL

Oregon Public Utility Commission Attn: Filing Center 550 Capitol Street N.E., #215 P.O. Box 2148 Salem, Oregon 97308-2148

Re:

In the Matter of the Northwest Natural Gas Company, dba NW Natural, Application for Deferred Accounting Order re Purchase of Gas Reserves

Docket No. UM 1520 and

In the Matter of NORTHWEST NATURAL GAS COMPANY, dba NW NATURAL Revision to Schedule P to include acknowledging the recovery of the cost of gas acquired through Hedged Gas Reserves

Docket No. UG 204

Dear Filing Center:

Enclosed for filing are an original and one (1) copy of **The Northwest Industrial Gas User's Motion to Admit Testimony and Exhibits** in the above-reference dockets. Please note that this document was submitted via electronic mail to the PUC Filing Center on this date, with copies served on the current Service List via e-mail and/or first class mail.

Thank you for your assistance, and please do not hesitate to contact our office with any questions.

Very truly yours,

Tommy A. Brooks

TAB:tb Enclosures

cc: UM 1520 and UG 204 Service Lists

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1520 and UG 204

In the Matter of)
NORTHWEST NATURAL GAS COMPANY, dba NW Natural,	NWIGU'S MOTION TO ADMIT TESTIMONY AND EXHIBITS
Application for Deferred Accounting Order) TESTIMONT AND EXHIBITS
Regarding Purchase of Gas Reserves and	,)
Application for Proposed Purchase of Natural)
Gas Reserves)

Pursuant to OAR 860-001-0350(7)(b), the Northwest Industrial Gas Users ("NWIGU") offers the following as evidence in this proceeding: (1) the Initial Intervenor Testimony of William R. Harper, Jr., filed on March 30, 2011; (2) the Errata Initial Intervenor Testimony of Paula E. Pyron, filed on March 31, 2011; and (3) the Supplemental Intervenor Testimony of Paula E. Pyron, filed on April 19, 2011.

Included with this motion are the affidavits of NWIGU's witnesses Paula E. Pyron and William R. Harper, Jr., in support of their testimony.

DATED this 27th day of April, 2011.

Tommy A. Brooks, OSB No. 076071

Cable Huston Benedict Haagensen & Lloyd

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Of Attorneys for the Northwest Industrial Gas Users

Page 1- NWIGU'S MOTION TO ADMIT TESTIMONY AND EXHIBITS

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 1520 and UG 204

)	
In the Matter of	
NORTHWEST NATURAL GAS COMPANY, dba NW Natural, Application for Deferred Accounting Order Regarding Purchase of Gas Reserves and Application for Proposed Purchase of Natural Gas Reserves	AFFIDAVIT OF WILLIAM R. HARPER, JR.
STATE OF OREGON)) ss	
County of Multnomah)	
I, William R. Harper, Jr., being first duly sworn	on oath, depose and say:
1. I am a Principal at Energy of Bus	siness Consulting Associates.
2. On behalf of the Northwest I	ndustrial Gas Users, I sponsored the pre-filed
testimony submitted in this docket entitled	Initial Intervenor Testimony of William R.
Harper, Jr	
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3. My statements in the pre-filed testimony are true and accurate based on my information and belief and my responses would be the same if I were to answer those same questions today.

SIGNED this 25th day of April, 2011.

William R. Harper, Jr.

SUBSCRIBED AND SWORN to before me this 25th day of April, 2011.

Notary Public for Oregon

My Commission Expires:

OFFICIAL SEAL
NATALIE LEHUA PRENTICE
NOTARY PUBLIC - OREGON
COMMISSION NO. 451004
MY COMMISSION EXPIRES JULY 25, 2014

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 1520 and UG 204

In the Matter of	
NORTHWEST NATURAL GAS COMPANY, dba NW Natural, Application for Deferred Accounting Order Regarding Purchase of Gas Reserves and Application for Proposed Purchase of Natural Gas Reserves	AFFIDAVIT OF PAULA E. PYRON
STATE OF OREGON)	
County of Multnomah) ss	
I, Paula Pyron, being first duly sworn on oath, d	lepose and say:
1. I am the Executive Director of the	ne Northwest Industrial Gas Users ("NWIGU").
2. On behalf of NWIGU, I spon	sored the pre-filed testimony submitted in this
docket entitled Errata Initial Intervenor Te	stimony of Paula E. Pyron, the Supplemental
Intervenor Testimony of Paula E. Pyron	, and the Joint Supplemental Testimony of
Stipulating Parties.	
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AFFIDAVIT OF PAULA E. PYRON

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3. My statements in the pre-filed testimony are true and accurate based on my information and belief and my responses would be the same if I were to answer those same questions today.

SIGNED this 25th day of April, 2011.

Paula E. Pyron

SUBSCRIBED AND SWORN to before me this 25th day of April, 2011.

Notary Public for Oregon

My Commission Expires: 1/0V. 12, 2011

OFFICIAL SEAL

DONNA R ALBIN

NOTARY PUBLIC-OREGON

COMMISSION NO. 422209

MY COMMISSION EXPIRES NOVEMBER 12, 2011

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing NWIGU'S MOTION TO ADMIT TESTIMONY AND EXHIBITS to be served via electronic mail and, where paper service is not waived, via postage-paid first class mail upon the following parties of record:

CITIZENS' UTILITY BOARD OF OREGON (W) Gordon Feighner, Energy Analyst 610 SW Broadway, Ste 400 Portland, OR 97205 gordon@oregoncub.org	CITIZENS' UTILITY BOARD OF OREGON (W) Robert Jenks, Executive Director 610 SW Broadway, Ste 400 Portland, OR 97205 bob@oregoncub.org
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NW NATURAL (W) Mark R. Thompson 220 NW 2 nd Avenue Portland, OR 97209 mrt@nwnatural.com	PUBLIC UTILITY COMMISSION OF OREGON (W) Moshrek Sobhy PO Box 2148 Salem, OR 97308-2148 moshrek.sobhy@state.or.us
CASCADE NATURAL GAS (W) Katherine Barnard Manager - Regulatory Affairs & Gas Supply 8113 W Grandridge Blvd Kennewick, WA 99336 kathie.barnard@cngc.com	CASCADE NATURAL GAS (W) Dennis Haider Executive VP, Regulatory, Gas Supply & Bus Develop 8113 W Grandridge Blvd Kennewick, WA 99336 dennis.haider@mdu.com

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Paula Pyron 4113 Wolf Berry Court Lake Oswego, OR 97035

Dated in Portland, Oregon, this 27th day of April, 2011.

Tommy A. Brooks, OSB No. 076071

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