

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Northern Natural Gas Company

)

Docket No. RP22-1033-000

**UNOPPOSED MOTION
TO SUSPEND THE PROCEDURAL SCHEDULE,
WAIVE ANSWER PERIOD AND REQUEST FOR EXPEDITED ACTION**

**To: The Honorable Andrew Satten
Acting Chief Administrative Law Judge**

**The Honorable Patricia M. French
Presiding Administrative Law Judge**

Pursuant to Rule 212 of the Federal Energy Regulatory Commission's (Commission) Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2022), Northern Natural Gas Company ("Northern") on behalf of all of the Participants in this proceeding,¹ respectfully requests that the Chief Administrative Law Judge, in consultation with the Presiding Administrative Law Judge, (i) suspend the procedural schedule in this proceeding with the understanding that the Participants shall submit a status report to the Chief and Presiding Judges if a settlement agreement has not been filed by June 30, 2023, (ii) waive the answering period to this Motion provided by Rule 213, 18 C.F.R. §385.213 (2022), and (iii) expeditiously grant the motion so that the Participants may avoid the significant time and expense associated with meeting a series of rapidly approaching

¹ Northern provided a draft of this Motion to all Participants in this proceeding, and none has expressed opposition to the requests set forth herein.

procedural deadlines. Granting this Motion will allow the Participants to draft and file definitive documents memorializing the settlement that all Participants have agreed to in principle, together with any associated documents.

This proceeding began when Northern filed a general section 4 rate case on July 1, 2022. The Participants in these proceedings have engaged in extensive settlement discussions which included multiple settlement conferences, numerous telephone conference calls, the exchange of settlement offers and counter-offers, and countless other communications to iron out the differences among the varied interests involved in this case. Despite the many diverse interests and strongly held opinions, the Participants reached an agreement in principle to settle the case on May 12, 2023. This Motion is an important step towards promptly finalizing and filing definitive settlement documents that will benefit all the Participants.

In light of the agreement in principle, the Participants request that the Chief Judge, in consultation with the Presiding Judge, suspend the procedural schedule with provision for a status report, as suggested above, so that the Participants can focus their time and resources on finalizing and filing a definitive offer of settlement. Good cause exists to grant this motion because it will (i) avoid the great time and expense of protracted litigation of a complex case involving numerous participants, (ii) provide benefits to the Participants much more quickly than litigation, and (iii) allow the Participants to focus their time and resources on finalizing a definitive offer of settlement.

Northern circulated a draft of this Motion to all Participants in this proceeding. No Participant has indicated that it opposes the request to suspend the procedural schedule. In light of the lack of opposition to this Motion, Northern requests, on behalf of all Participants, that the Chief Judge, in consultation with the Presiding Judge, act as soon as possible to waive the answering period to this Motion and issue an order suspending the procedural schedule, thereby allowing the Participants to focus their efforts on finalizing an offer of settlement.

CONCLUSION

The Participants request that (i) the procedural schedule be suspended with a requirement to report to the Chief Administrative Law Judge and the Presiding Administrative Law Judge or to file an offer of settlement by June 30, 2023, (ii) the answering period for this motion be waived in light of the fact that all Participants either support or do not oppose the Motion, and (iii) the Motion be granted expeditiously.

Respectfully submitted,

/s/ Monique L. Watson

Monique L. Watson

Karen Bruni

STEPTOE & JOHNSON LLP

1330 Connecticut Avenue, N.W.

Washington, D.C. 20036-1795

mwatson@steptoe.com

kbruni@steptoe.com

Kirk Lavengood
Vice President, General Counsel
& Regulatory Affairs
J. Gregory Porter
Assistant General Counsel
Britany S. Shotkoski
Senior Attorney
Northern Natural Gas Company
1111 South 103rd Street
Omaha, Nebraska 68124-1000
kirk.lavengood@nngco.com
greg.porter@nngco.com
britany.shotkoski@nngco.com

*Counsel for Northern Natural Gas
Company*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document on each person designated on the official service list compiled by the Secretary for this proceeding.

Dated at Washington, D.C. this 15th day of May 2023.

/s/ Karen Bruni

Karen Bruni
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 429-6454
kbruni@steptoe.com