Rates and Regulatory Affairs Facsimile: 503.721.2532



September 17, 2008

VIA ELECTRONIC FILING

Public Utility Commission of Oregon 550 Capitol Street, N.E., Suite 215 P.O. Box 2148 Salem, Oregon 97308-2148

Attn: Filing Center:

Re: AR 529 Rulemaking: Comments of NW Natural

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), supports the proposed changes to OAR 860-021-0305, 860-021-0405, and 860-021-0505, and does not oppose the changes proposed to OAR 860-034-0180 and 860-034-0260.

NW Natural would like to specifically thank Staff for their efforts in working with the utilities and other parties during the pre-rulemaking process.

Thank you for the opportunity to comment in this matter.

Sincerely,

/S/ ONITA R. KING

Onita R. King Rates & Regulatory Affairs

cc: Phil Boyle, OPUC Staff
Jason Hoffman, Pacific Power
Terri Bowman, Portland General Electric
Debbie Williams, Avista Utilities
Julie Marshall, Cascade Natural Gas