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January 6, 2009

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
550 Capitol Street, NE, Suite 215
PO Box 2148
Salem, Oregon 97308-2148

Attention: Filing Center

Re: Comments on AR 530, Rulemaking for Integrated Resource Plan Filing Guidelines

NW Natural filed informal comments on September 5, 2008, stating it supported Staff's proposed rule, emailed August 28, 2008, entitled, OAR 860-027-0400, Integrated Resource Plan Filing, Review and Update. The Company now files to reiterate its support of these rules docketed as AR 530. NW Natural also reasserts its claim that complying with these rules will not cause it to incur additional costs.

NW Natural appreciates the opportunity to comment.

Please feel free to call if you have questions.

Sincerely,

/s/ Inara K. Scott

Inara K. Scott

cc: Lori Koho, OPUC
Diane Davis, OPUC



CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing COMMENTS OF NW NATURAL ON STAFF'S PROPOSED RULES in Docket No. AR 530 upon all parties or attorneys' of parties by electronic mail or by First Class US Mail, postage prepaid and properly addressed, to those parties who have not waived paper service.

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DATED this 6th day of January 2009.

Respectfully submitted,

NW NATURAL

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