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**VIA ELECTRONIC FILING**

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

Attn: Filing Center

**Re: AR 571 – Revision to OAR 860-021-0015(1) to clarify utilities retention period for dispute records**

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), submits the following comments in the above-referenced docket.

NW Natural supports the proposed revisions to the rule, but suggests that the last sentence of the section (1) be further revised as follows:

*“The utility must retain records of the dispute for not less than 36 months.”*

The suggested change will ensure that utilities that desire to maintain retain records for a longer period of time are not unduly restricted to 36 months.

NW Natural appreciates the opportunity to submit comments in this rulemaking docket. Please direct any questions regarding these comments to me and to e-Filing as follows:

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Sincerely,

NW NATURAL

*/s/ Onita R. King*

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