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VIA ELECTRONIC FILING

January 13, 2020

Public Utility Commission of Oregon Attention: Filing Center 201 High Street SE Suite 100 Post Office Box 1088 Salem, Oregon 97308-1088

Re: UM 2011—General Capacity Investigation, Phase III, Capacity Value NW Natural's Response to Request for Written Comments (Part B)

Northwest Natural Gas Company, dba NW Natural (NW Natural or the Company), files herewith this letter in the above referenced docket in response to Public Utility Commission of Oregon Staff's request for written comments on Part B of the set of questions issued by Staff on November 15, 2019.

Staff requested utilities and stakeholders file written comments regarding a set of questions in two major sections: 1) Which Resource Attributes are Appropriate to "Capacity"?; and, 2) How Should Capacity be Valued. NW Natural filed comments for the first section of questions (Part A) on December 16, 2019. NW Natural has no further comments on Part B questions. NW Natural will continue to participate in this docket and may provide further comments as the docket progresses.

NW Natural thanks Staff for this opportunity to comment and looks forward to continuing to actively participate in this proceeding

Please feel free to call should you have questions.

Sincerely,

/s/ Rebecca T. Brown

Rebecca T. Brown Regulatory Compliance