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February 27, 2008

VIA ELECTRONIC MAIL

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

Attn: Filing Center

Re: Extension of 2007 IRP Deadline in Docket No. UM 1343, Order No. 07-413

Northwest Natural Gas Company (“NW Natural”) respectfully requests an additional extension of time in which to file its 2007 Integrated Resource Plan (“IRP”) from the current deadline of March 1, 2008, to April 14, 2008. See Order No. 07-413 (Sept. 20, 2007). This extension will allow NW Natural time to receive more extensive comments from participants in the Technical Working Group and to incorporate those comments into its IRP filing.

As the Commission is aware, NW Natural’s 2007 IRP was originally due to be filed in the third quarter of 2007. Order No. 07-002 at 26 (Jan. 8, 2007). On September 6, 2007, NW Natural requested an extension of this deadline, explaining that the employee responsible for drafting the IRP had left the company unexpectedly, leaving the company without sufficient expertise to operate the IRP modeling software. The Commission granted NW Natural’s request, giving the Company until March 1, 2008, to file the IRP.

Since the Commission granted the first request, NW Natural has worked diligently toward completion of the IRP. The Company began by hiring a consultant to update the draft plan and to review the model. Based upon that consultant’s report, the Company began to make extensive revisions to the draft plan. On February 7, 2008, we distributed a complete and revised draft of the IRP to the Technical Working Group and requested comments on that draft. On February 19, 2008, the Company held a Technical Working Group meeting and received some comments. However, Staff and other parties have requested more time to provide detailed feedback on the current draft.

NW Natural understands the importance filing its IRP in a timely manner. However, the Company believes that it is equally important that it receive full and robust feedback on its draft from all parties in order to ensure the quality of the final product. For this reason, we request that the Commission extend the IRP filing deadline to Monday, April 14, 2008.

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NW Natural has discussed its intention to request this extension with major IRP stakeholders. Staff supports NW Natural's request for an extension; Energy Trust has indicated that it would be valuable for them to review the efficiency components of the IRP in more detail with NW Natural; and NWIGU and CUB have both confirmed that they do not object to the extension.

Thank you for your consideration of this matter.

Sincerely,

/s/ Inara Scott

Inara K. Scott
Manager, Regulatory Affairs

cc: IRP Technical Working Group (electronically)



CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of February, 2008, I served the foregoing NOTICE OF NORTHWEST NATURAL'S REQUEST FOR AN EXTENSION OF TIME TO FILE ITS 2007 INTEGRATED RESOURCE PLAN upon all parties of record in OPUC Docket No. LC 37 proceeding via electronic mail to the following parties or attorneys of parties:

/s/ Kelley C. Miller
Kelley C. Miller, Staff Assistant
Rates & Regulatory Affairs
NW NATURAL
220 NW Second Avenue
Portland, Oregon 97209-3991
1.503.226.4211, extension 3589

OPUC DOCKET NO. LC 37

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