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March 29, 2012

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

Attention: Filing Center

Re: RG-\_\_\_\_\_  
2011 Annual Report of Promotional Activities and Concessions

Enclosed please find Northwest Natural Gas Company's (NW Natural or the Company),  
2011 Promotional Activities and Concessions Report, pursuant to OAR 860-026-0035.

Please call me at (503)226-4211, extension 3590, if you have any questions.

Sincerely,

*/s/ Jennifer Gross*

Jennifer Gross  
Tariff and Regulatory Compliance Consultant

enclosure



Annual Report of Promotional Activities and Concessions  
2011 Actual Expenditures

Program

1. General Merchandise Sales Program. Reference: Sheet 200-2

2009 Expenditures: \$ 4,021,676.62

Benefits:

Activities under this program are specifically designed to increase the sale of gas appliances within the Company's service territory. The greater saturation of gas appliance usage per customer achieved through gas appliance sales benefits the system by increasing load factor and reducing the Company's cost of providing service.

2. Equipment Sales Promotions. Reference: Sheet 200-3

2009 Expenditures: \$ 402,002.14

Benefits:

This program is designed to increase overall consumer interest in using natural gas equipment. Building and maintaining dealer interest in marketing gas equipment benefits the system because it serves to increase the saturation of gas appliance usage within the Company's service territory.

3. Cooperative Advertising Program. Reference: Sheet 200-4

2009 Expenditures: \$ 0

Benefits:

Cooperative advertising serves to double the potential sales impact of every dollar spent to advertise in the space and water heating markets. Benefits of cooperative advertising to the system are the resulting minimization of potential customer losses to competing fuels, and the achievement of a healthy and diverse market of wholesale and retail gas appliance dealers, all of whom provide valuable sales and maintenance services to gas customers and the public generally.

The Company did not make any promotional offers in this category during 2010.

4. Showcase Developments. Reference: Sheet 200-5

2009 Expenditures: \$ 53,589.49

Benefits:

The Company's participation in new home developments serves to educate the building trades and the general public concerning the use of high efficiency natural gas equipment in the new home construction market. The system benefits from such participation because potential customer losses to competing fuels are minimized and greater saturation of natural gas appliances is achieved, both of which result in a lower cost to the Company of providing service.

5. Natural Gas Vehicle Program. Reference: Sheet 200-6

2009 Expenditures: \$ 0

Benefits:

This program is designed to encourage the purchase and use of natural gas in motor vehicles. Natural gas use in motor vehicles within the Company's service territory benefits the system by increasing natural gas usage, which reduces the company's cost of gas to all ratepayers.

The Company did not make any promotional offers in this category during 2010.

6. Equipment Financing Program. Reference: Sheet 200-7

2009 Expenditures: \$ 0

Benefits:

Activities under this program are specifically designed to increase the sale of gas appliances within the Company's service territory. The greater saturation of gas appliance usage per customer achieved through gas appliance sales benefits the system by increasing load factor and reducing the Company's cost of providing service.

The Company did not make any promotional offers in this category during 2010.

7. Company offered Products and Services. Reference: Sheet 200-8

2009 Expenditures: \$622,255.46

Benefits:

Activities under this program are specifically designed to increase enrollment in programs such as Smart Energy™, Paperless Billing, Equal Pay and Auto Pay.

e-FILING REPORT COVER SHEET

REPORT NAME: NW Natural 2011 Annual Report of Promotional Activities and Concessions

COMPANY NAME: NW Natural

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION?  No  Yes

If yes, please submit only the cover letter electronically. Submit confidential information as directed OAR 860-001-0070 or the terms of an applicable protective order.

If known, please select designation:  RE (Electric)  RG (Gas)  RW (Water)  
 RO (Other)

Report is required by:  OAR Enter Rule number: OAR 860-026-0035  
 Statute Enter Statute:  
 Order Enter Commission Order No.:  
 Other Enter reason:

Is this report associated with a specific docket/case?  No  Yes  
If Yes, enter docket number: Enter docket number:

Key words: NW Natural, 2011, Annual Report, Promotional Concessions, Promotional Activities, Promotional Activities and Concessions

If known, please select the PUC Section to which the report should be directed:

- Corporate Analysis and Water Regulation
- Economic and Policy Analysis
- Electric and Natural Gas Revenue Requirements
- Electric Rates and Planning
- Natural Gas Rates and Planning
- Utility Safety, Reliability & Security
- Administrative Hearings Division
- Consumer Services Section

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- Any other Telecommunications Reporting or
- Any daily safety or safety incident reports or
- Accident reports required by ORS 654.715.