

e-FILING REPORT COVER SHEET

REPORT NAME: 2011 Annual Report of Upstream Service Activity

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  
 Statute  
 Order Order No. 95-195  
 Other

Is this report associated with a specific docket/case?  No  Yes  
If Yes, enter docket number: UM 631

Key words: Annual Report, 2011, Upstream Service Activity

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
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- **Accident reports required by ORS 654.715.**

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February 15, 2012

***VIA ELECTRONIC MAIL***

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

**Attn: Filing Center**

**Re: RG \_\_\_\_: 2011 Annual Report of Upstream Service Activity  
OPUC Docket No. UM 631**

Per Oregon Public Utilities Commission Order 95-195 (Feb. 10, 1995), Northwest Natural (NW Natural, or the Company) is required to file an annual activity summary with the Commission regarding services provided upstream of the point of interconnection between NW Natural facilities and the facilities of an interstate pipeline. This report is for the year ending December 31, 2011.

During 2011, NW Natural had no customers in its Upstream Service Program. The program is not promoted, carries a higher price than is offered by most marketers outside the Company, and NW Natural does not anticipate having any new customers in 2012.

Please call if you have questions.

Sincerely,

/s/ Onita King

Onita R. King  
Rates & Regulatory Affairs

cc.: Nancy Lange  
Larry Walker