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April 17, 2014

Steven King, Executive Director & Secretary  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park Drive SW  
Post Office Box 47250  
Olympia, Washington 98504-7250

**Re: UG-131840 – Supplemental Filing  
Amendment No. 1 to NW Natural’s Modified 2013 Washington Pipeline  
Replacement Plan**

Dear Mr. King:

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), hereby provides one original and two copies of Amendment No. 1 to the Company’s Modified 2013 Washington Pipeline Replacement Plan (Plan).

The Modified Plan was filed on September 13, 2013, in compliance with the Commission’s Policy Statement on the Accelerated Replacement of Pipeline Facilities with Elevated Risk, issued December 31, 2012, in Docket No. UG-120715. The Commission approved the plan in Order No. 1 issued October 10, 2013, in the subject docket.

The Company is now filing Amendment No. 1 to its approved Plan because the content of its two year pipeline replacement plan has changed. The Company’s approved Plan says that all base steel pipeline in Washington will be removed by 2014. Section III(B), found on pages 8 and 9 of the Plan, is hereby modified with the attached Amendment to state that the bare steel pipeline in Washington will be removed by the end of 2015. The Company has experienced some minor delays in construction. Estimated costs are also updated.

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

Sincerely,

*/s/ Jennifer Gross*

Jennifer Gross

Enclosures

**B. Bare Steel Replacement Plan**

Bare Steel was installed in NW Natural's distribution system between approximately 1920 and 1960. NW Natural's distribution system in the State of Washington currently includes approximately 3 miles of unprotected bare steel main and 0.6 miles of cathodically protected bare steel main. All bare steel services in the State of Washington have been replaced using current state of the art materials.

These bare steel mains are susceptible to the threat of external corrosion and associated leakage. As identified in NW Natural's DIMP Risk Model, bare steel main represents the largest corrosion threat in NW Natural's distribution system.

NW Natural has allocated resources and is actively replacing bare steel pipe system-wide. The Company plans to complete the replacement of the remaining bare steel main in the State of Washington prior to the end of 2015. Replacement projects are prioritized by relative risk, scope of work, and are coordinated with municipalities to minimize impact to the infrastructure (e.g. roads) and the public. Washington bare steel main replacement projects and associated costs are identified in Figure 3.

**Figure 3 –**

Installation Date	CITY	Length	Street	Cross Street	Action	Estimated Cost		
						2013	2014	2015
01/01/59	VANCOUVER	2100	E MILL PLAIN BLVD	90th to 97th	2013 Construction	\$950,000	\$100,000	
01/01/56	VANCOUVER	8150	E MILL PLAIN BLVD	DEVINE Rd to Leisner	2014 Construction		\$2,800,000	
01/01/56	VANCOUVER	5600	NW LINCOLN AVE	NW BERNIE TO NW 44TH	2015 Construction			\$2,000,000
01/01/58	CAMAS	401	SE 6TH AVE	SE 3RD	2014 Construction	\$60,000	\$40,000	
01/01/56	VANCOUVER	38	F ST	40TH	Validated Coated 2013	\$0		
01/01/61	VANCOUVER	20	Q ST	E. 29TH ST	Validated Coated 2013	\$0		
01/01/25	VANCOUVER	13	K ST	E 29TH	Validated Coated 2013	\$0		
01/01/25	VANCOUVER	7	E 26TH ST	FORT VANCOUVER WAY	Validated Coated 2013	\$0		
01/01/54	CAMAS	11	NE DALLAS ST	6TH	to be validated			
						\$1,010,000	\$2,940,000	\$2,000,000