



Rob McKenna

ATTORNEY GENERAL OF WASHINGTON

April 25, 2012

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SENT VIA E-MAIL & U.S. MAIL

David Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

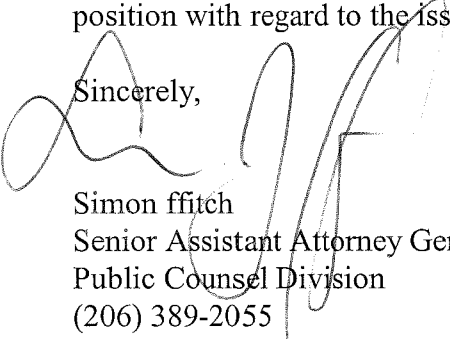
Re: WUTC v. Northwest Natural Gas Company
Docket No. UG-111233

Dear Mr. Danner:

Public Counsel initially indicated to Northwest Natural Gas it would oppose the company's request in this docket for a prudence finding regarding its joint venture with Encana Oil & Gas (USA) Inc. (Encana). Public Counsel consequently did not object to the Joint Motion to Allow Withdrawal of Tariff Filing in September 2011. Public Counsel's concerns centered on the risks and uncertainties associated with the transaction, including the long term nature of the venture, uncertainties regarding future gas prices, the environmental risks, and the unproven track record for this type of transaction.

This letter is to confirm that Public Counsel has no objection to the Settlement Stipulation between Commission Staff and Northwest Natural Gas filed April 24, 2012, in this docket. Public Counsel's position is based on the understanding that, as provided in paragraph 24 of the Stipulation, this agreement is limited to this transaction, and if approved has no precedential effect with respect to any future transactions or proposals of Northwest Natural Gas or other regulated Washington company. Public Counsel reserves the right to respond to and take any position with regard to the issues raised by any such future proposals or transactions.

Sincerely,



Simon Ffitch
Senior Assistant Attorney General
Public Counsel Division
(206) 389-2055

Sf:cjw

cc: Service List (E-mail and U S Mail)