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March 30, 2005

Carole J. Washburn  
Washington Utilities and Transportation Commission  
1300 So. Evergreen Park Drive SW  
Olympia, WA 98504-7250

**Re: Docket UG-\_\_\_\_\_: NW Natural's Application for an Order Authorizing the Issuance and Sale of up to \$50,000,000 of Medium-Term Notes, Series B, from NW Natural's Shelf Registration for an additional \$160,000,000 principal amount of Medium-Term Notes**

Dear Ms. Washburn:

Transmitted herewith for filing with the Commission is an Application of Northwest Natural Gas Company requesting an Order of the Commission Establishing Compliance with RCW 80.08.040 and WAC 480-146-290 with respect to the Company's proposed issuance and sale of up to \$50,000,000 principal amount of its Medium-Term Notes, Series B.

The Application filed herein incorporates by reference the background information with respect to the Company's \$160,000,000 of Medium-Term Notes from the Shelf Registration described in its Statement in Docket UG-040405.

Also transmitted herewith is a draft recommended order of the Commission for use in connection with the processing of the Company's Application.

If you have any questions, or if you require additional information in support of this Application, please give me a call at 503-220-2345 or e-mail at [steve.feltz@nwnatural.com](mailto:steve.feltz@nwnatural.com).

Upon completion, please forward to Mr. C.J. Rue, Corporate Secretary, at this address, 10 certified copies of the Order of the Commission in this Docket.

Sincerely,

/s/ Stephen P. Feltz  
Stephen P. Feltz  
Treasurer and Controller

cc: w/Encl.: John T. Hood, Esq.  
Margaret D. Kirkpatrick, Esq.  
John M. Schweitzer, Esq.  
David H. Anderson  
C.J. Rue  
Richelle T. Luther  
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