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August 6, 2018

**VIA Electronic Filing**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
PO Box 47250  
Olympia WA 98504-7250

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**RE: Docket No. UW-180630: In the Matter of the Application for the Sale and Transfer of Assets from Lehman Enterprises, Inc. to Cascadia Water, LLC.**

Dear Mr. Johnson,

Northwest Natural Gas Company (“NW Natural” or “Company”) submits this claim of confidentiality pursuant to WAC 480-07-160(4)(a) in connection with confidential information filed with the Washington Utilities and Transportation Commission on July 17, 2018 in the above-captioned proceeding. NW Natural, through its Application for the Sale and Transfer of Assets from Lehman Enterprises, Inc. to Cascadia Water, LLC and supporting Exhibit 1, disclosed certain information that is confidential and constitutes “valuable commercial information” as defined by WAC 480-07-160(2) and is protected under WAC 480-07-160 and RCW 80.04.095. The confidential information that NW Natural disclosed includes the purchase price for the acquisition of Lehman Enterprises, Inc. (“Lehman”) and related terms and conditions of the sale, which is sensitive information due to the competitive market for water utility acquisitions, and as such, comprises valuable commercial information. Disclosure of the confidential information could negatively impact the Company’s ability to negotiate future acquisitions, and may result in harm to Lehman. Accordingly, this information is confidential, as defined by WAC 480-07-160(2), and should be protected from public inspection, examination and copying.

Sincerely,

*/s/ Zachary D. Kravitz*

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