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July 20, 2015

VIA ELECTRONIC FILING

WASHINGTON UTILITIES & TRANSPORTATION COMMISSION 1300 S Evergreen Park Drive, SW Post Office Box 47250 Olympia, Washington 98504-7250

ATTENTION: Records Center

Re: Docket A-130355 - Rulemaking to Consider Possible Corrections and Changes in Rules in

WAC 480-07 (Procedural Rules)

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company"), submits the following comments in response to the Washington Utilities & Transportation Commission's ("Commission") June 18, 2015 Notice of Opportunity to File Written Comments (the "Notice") issued in Docket U-130355. The Notice states that a CR 101 was filed to consider the adoption of rules within Washington Administrative Code (WAC) 480-07, the Commission's procedural rules. The Notice further states that the Commission has developed draft rules for Part III of this chapter and is seeking written comments from interested persons.

The Company appreciates the thoroughness of the Commission Staff's proposed revisions to Part III of WAC 480-07 and has no additional comment or suggested changes at this time.

Thank you for the opportunity to provide comment in this proceeding. We look forward to participating in the January workshop.

Please address correspondence on this matter to me with copies to the following:

eFiling NW Natural Rates & Regulatory Affairs 220 NW Second Avenue Portland, Oregon 97209 Telecopier: (503) 721-2516

Telephone: (503) 226-4211, ext. 3589 E-mail: eFiling@nwnatural.com

Sincerely,

/s/ Onita King

Onita R. King Rates and Regulatory Affairs