NW Natural submits the following general comments in the above-referenced matter:

- 1. 480-80-045 Filing of banded tariffs. This rule currently appears to apply only to Telecommunications companies. However, the issue of banded tariffs could apply to both electric and gas energy service as well. If not already addressed in another rule, it may be appropriate for this rule to be revised to incorporate electric and gas.
- 2. 480-80-070 Statutory notice. This rule refers to a process for filing by facsimile transmission. It may be appropriate to also address electronic (e-mail) filings.
- 3. 480-80-080 and 480-80-090 Tariff file at principal business office/Tariff file at designated business offices. Consider combining these two rules as much of the language is duplicative.
- 4. 480-80-125 Notice by utility to customers concerning hearing. Comments may follow upon a more complete review of this rule.
- 5. 480-80-160 General arrangement of tariff. At (2), consider eliminating the signature requirement on the tariff sheet.

These comments may be later supplemented once we have had the opportunity to conduct a more thorough review of Chapter 480-80 WAC. Please place my name on the service list for this docket.

Thank you for the opportunity to participate in this rules review process.

Sincerely,

Onita King NW Natural Rates & Regulatory Affairs 220 NW Second Avenue Portland, Oregon 97209 (503) 226-4211 x 3586