06-05 1400 (5F)

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September 13, 2005

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

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket UG--_____: NW Natural's Lines of Credit with Five Commercial Banks and \$200,000,000 of Five-Year Notes to be Issued in Connection therewith, constituting a Back-Up Line of Credit for a Commercial Paper Program.

Dear Ms. Washburn:

Transmitted herewith for filing with the Commission are an original and one conformed copy of the Statement and Application of Northwest Natural Gas Company ("NW Natural") Establishing Compliance with RCW 80.08.040 and WAC 480-146-290 with respect to NW Natural's proposal to enter into lines of credit with five commercial banks and to issue in connection therewith five-year notes aggregating \$200,000,000, which back up NW Natural's commercial paper program.

NW Natural is requesting a written order in connection with this filing. A proposed form of order is enclosed.

Please advise me, and Shawn Filippi, Associate Counsel for NW Natural, at this address if the Commission deems any additional information to be necessary in support of this Statement and Application.

Very truly yours,

Stephen P. Feltz

Treasurer & Controller

Enclosures

Cc w/ Encl.: Margaret D. Kirkpatrick

C.J. Rue

Shawn M. Filippi