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May 27, 2009

Dave Danner, Secretary and Executive Director
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P. O. Box 47250
Olympia, WA 98504-7250

Attention: Supervisor of Utility Finance

Re: 2008 Annual Securities Report

Ladies and Gentlemen:

This filing is submitted in accordance and in compliance with Washington Administrative Code 480-90-262 with respect to Northwest Natural Gas Company's (the "Company") annual securities transaction report.

(1) Schedule of Securities Issued.

By letters, each dated January 30, 2009, the Company submitted to the Commission securities issuance reports ("Securities Reports"), including detailed descriptions and terms of the Company's securities issued during 2008, pursuant to orders issued in the following dockets:

- Docket UG-011173;
- Docket UG-001244;
- Docket UG-030290;
- Docket UG-050890;
- Docket UG-061700;
- Docket UG-070940; and
- Docket UG-061346.

The Company will no longer be issuing securities under, and therefore will not file further reports on Docket No. UG-061346.

(2) Use of Proceeds from Securities Transactions.

By letters, each dated January 30, 2009, related to the above-referenced dockets, the Company included in its Securities Reports a description of the use of proceeds for each of its securities issuances, stating the amounts used for the

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purposes allowed by Revised Code of Washington 80.08.030.

(3) Expenses for Securities Transactions.

By letters, each dated January 30, 2009, related to the above-referenced dockets, the Company included in its Securities Reports the expenses, if any, incurred for each of its securities transactions in 2008.

(4) Schedule of Securities Retired, Refunded or Repurchased.

The following table provides information about purchases of our equity securities during the year ended December 31, 2008:

Type of Security	(a) Total Number of Shares Purchased ⁽¹⁾	(b) Average Price Paid per Share	(c) Total Number of Shares Purchased as Part of Publicly Announced Plans or Programs ⁽²⁾	Dollar Value of Shares Repurchased Under the Plans or Programs
Common Stock	143,125	\$45.18	0	\$0.00

⁽¹⁾ During the year ended December 31, 2008, 88,824 shares of our common stock were purchased in the open market to meet the requirements of our Dividend Reinvestment and Direct Stock Purchase Plan (DRIP/DSPP). In addition, 54,301 shares of our common stock were purchased in the open market during the year under equity-based programs. During the year ended December 31, 2008, no shares of our common stock were accepted as payment for stock option exercises pursuant to our Restated Stock Option Plan.

⁽²⁾ We have a share repurchase program for our common stock under which we purchase shares on the open market or through privately negotiated transactions. We currently have Board authorization through May 31, 2010 to repurchase up to an aggregate of 2.8 million shares or up to an aggregate of \$100 million. For the year ended December 31, 2008, no shares of our common stock were purchased pursuant to this program. Since the program's inception in 2000 we have repurchased 2.1 million shares of common stock at a total cost of \$83.3 million.

(5) Schedule of Securities Scheduled to Mature in 2009.

There are no securities scheduled for Maturity during 2009.

If you have any questions, or need any additional information, please call.

Sincerely,

A handwritten signature in black ink, appearing to read "MardiLyn Saathoff", written over a horizontal line.

MardiLyn Saathoff
Chief Governance Officer and Corporate Secretary