

Rates and Regulatory Affairs
Facsimile: 503.721.2516



May 5, 2009

NWN Advice No. WUTC 09-6

VIA ELECTRONIC FILING

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

Re: Comprehensive Housekeeping Filing
Tariff Revisions Re: Large Commercial / Industrial Provisions

Dear Mr. Danner:

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), files herewith revisions to its Tariff, P.U.C. Or. 24, as listed on the attached Table of Tariff Sheet revisions. The Tariff sheets are stated to become effective with service on and after **July 31, 2009**:

The purpose of this filing is to revise portions of the Company's Tariff to clarify existing provisions that the Company has learned through experiences during the 2008-2009 heating season were either unclear or incomplete. Prior to submission of this filing, the Company reviewed the revisions proposed herein with a representative of the Northwest Industrial Gas Users (NWIGU).

This filing also proposes the elimination of Rate Schedule 54 "Emergency Sales Service". The Company has sole discretion to make gas available to non-residential customers for emergency purposes under Schedule 54. The Company has not authorized gas usage under this Rate Schedule since the early 1990's, when its availability was restricted to institutional customers, defined as "public and private schools; hospitals and other medical care facilities; churches; and facilities of municipal state and federal governments and agencies thereof, except those leased or rented for non-government purposes".

There is no clear role for Schedule 54 emergency service in today's operating environment. However, in discussions with a representative from NWIGU, the Company agreed that service to certain institutional customers should carry a higher priority than other non-residential customers. These higher priority customers are better identified as essential human needs customers where such customers use natural gas

to operate equipment that is necessary to support or sustain human life. As such, we have refined the definition of an essential human needs customer, and we have added language to General Rule 15 "Curtailed Priority" that adds additional protection to a firm service essential human needs customer in the event of firm service curtailment. An essential human needs customer that chooses to take service under an interruptible service option will be subject to curtailment in the same manner as any other non-residential customer. However, language has been added to General Rule 16 that provides additional protection to the essential human needs customer from being valved-off for failure to comply with a curtailment order.

A copy of the filing is available for public inspection in the Company's main office in Portland, Oregon and on its website at www.nwnatural.com.

As required by WAC 480-80-103(4)(a), I certify that I have authority to issue tariff revisions on behalf of NW Natural.

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

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Please email me at ork@nwnatural.com, or call me at (503) 721-2452 if you have any questions.

Sincerely,

/s/ Onita King

Onita R. King
Rates & Regulatory Affairs

TABLE OF TARIFF SHEET REVISIONS
 PROPOSED TO BECOME EFFECTIVE JULY 31, 2009

PROPOSED REVISION	CANCELS REVISION	SCHEDULE TITLE
Seventh Revision of Sheet vi	Sixth Revision of Sheet iii	Tariff Index (continued)
Third Revision of Sheet 00.1	Second Revision of Sheet 00.1	General Rules and Regulations
Fourth Revision of Sheet 00.2	Third Revision of Sheet 00.2	General Rules and Regulations (continued)
Fourth Revision of Sheet 00.3	Third Revision of Sheet 00.3	General Rules and Regulations (continued)
Third Revision of Sheet 00.4	Second Sheet 00.4	General Rules and Regulations (continued)
Fourth Revision of Sheet 00.5	Third Revision of Sheet 00.5	General Rules and Regulations (continued)
Sixth Revision of Sheet 00.6	Fifth Revision of Sheet 00.6	General Rules and Regulations (continued)
Fourth Revision of Sheet 00.7	Third Revision of Sheet 00.7	General Rules and Regulations (continued)
Second Revision of Sheet 00.8	First Revision of Sheet 00.8	General Rules and Regulations (continued)
Second Revision of Sheet 1.1	First Revision of Sheet 1.1	General Rules and Regulations (continued)
Original Sheet 1.2	N/A	General Rules and Regulations (continued)
Second Revision of Sheet 2.1	First Revision of Sheet 2.1	General Rules and Regulations (continued)
First Revision of Sheet 10.1	Original Sheet RR-10.1	General Rules and Regulations (continued)
Third Revision of Sheet 15.1	Second Revision of Sheet 15.1	General Rules and Regulations (continued)
Second Revision of Sheet 16.1	First Revision of Sheet 16.1	General Rules and Regulations (continued)
Original Sheet 16.2		General Rules and Regulations (continued)
Third Revision of Sheet 20.1	Second Revision of Sheet 20.1	General Rules and Regulations (continued)
Sixth Revision of Sheet C.1	Fifth Revision of Sheet C.1	Schedule C Miscellaneous Charges
Fourth Revision of Sheet C.3	Third Revision of Sheet C.3	Schedule C Miscellaneous Charges (continued)
Fifth Revision of Sheet T.1	Fourth Revision of Sheet T.1	Schedule T Customer-Owned Natural Gas Transportation Service
Eighth Revision of Sheet T.2	Seventh Revision of Sheet T.2	Schedule T Customer-Owned Natural Gas Transportation Service (continued)
Third Revision of Sheet T.4	Second Revision of Sheet T.4	Schedule T Customer-Owned Natural Gas Transportation Service (continued)

PROPOSED REVISION	CANCELS REVISION	SCHEDULE TITLE
Fourteenth Revision of Sheet 103.1	Thirteenth Revision of Sheet 103.1	Schedule 3 Basic Firm Sales Service – Non-Residential
Sixth Revision of Sheet 103.2	Fifth Revision of Sheet 103.2	Schedule 3 Basic Firm Sales Service – Non-Residential (continued)
Fifth Revision of Sheet 103.3	Fourth Revision of Sheet 103.3	Schedule 3 Basic Firm Sales Service – Non-Residential (continued)
Fourth Revision of Sheet 141.1	Third Revision of Sheet 141.1	Schedule 41 Non-Residential Sales and Transportation Service
Fifth Revision of Sheet 141.2	Fourth Revision of Sheet 141.2	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Third Revision of Sheet 141.3	Second Revision of Sheet 141.3	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Original Sheet 141.3.1	N/A	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Third Revision of Sheet 141.4	Second Revision of Sheet 141.4	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Original Sheet 141.4.1	N/A	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 141.5	First Revision of Sheet 141.5	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 141.6	First Revision of Sheet 141.6	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 141.7	First Revision of Sheet 141.7	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 141.8	First Revision of Sheet 141.8	Schedule 41 Non-Residential Sales and Transportation Service (continued)
Fourth Revision of Sheet 142.1	Third Revision of Sheet 142.1	Schedule 42 Large Volume Non-Residential Sales and Transportation Service
Fifth Revision of Sheet 142.2	Fourth Revision of Sheet 142.2	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Fifth Revision of Sheet 142.3	Fourth Revision of Sheet 142.2	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)

PROPOSED REVISION	CANCELS REVISION	SCHEDULE TITLE
Original Sheet 142.3.1	N/A	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Third Revision of Sheet 142.4	Second Revision of Sheet 142.4	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Original Sheet 142.4.1	N/A	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Fourth Revision of Sheet 142.5	Third Revision of Sheet 142.5	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 142.6	First Revision of Sheet 142.6	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 142.7	First Revision of Sheet 142.7	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 142.8	First Revision of Sheet 142.8	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Second Revision of Sheet 142.9	First Revision of Sheet 142.9	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Fourth Revision of Sheet 142.10	Third Revision of Sheet 142.10	Schedule 42 Large Volume Non-Residential Sales and Transportation Service (continued)
Fourth Revision of Sheet 143.1	Third Revision of Sheet 143.1	Schedule 43 High Volume Non-Residential Firm and Interruptible Transportation Service
Fifth Revision of Sheet 143.2	Fourth Revision of Sheet 143.2	Schedule 43 High Volume Non-Residential Firm and Interruptible Transportation Service (continued)
Second Revision of Sheet 143.3	First Revision of Sheet 143.3	Schedule 43 High Volume Non-Residential Firm and Interruptible Transportation Service (continued)
First Revision of Sheet 143.4	Original Sheet 143.4	Schedule 43 High Volume Non-Residential Firm and Interruptible Transportation Service (continued)

PROPOSED REVISION	CANCELS REVISION	SCHEDULE TITLE
Original Sheet 143.4.1	N/A	Schedule 43 High Volume Non-Residential Firm and Interruptible Transportation Service (continued)
First Revision of Sheet 143.5	Original Sheet 143.5	Schedule 43 High Volume Non-Residential Firm and Interruptible Transportation Service (continued)
Seventeenth Revision of Sheet 154.1	Sixteenth Revision of Sheet 154.1	Schedule 54 Emergency Sales Service
First Revision of Sheet 250.1	Original Sheet 250.1	Schedule 250 Monthly Incremental Cost of Gas