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April 14, 2011

NWN Advice No. WUTC 11-3

VIA ELECTRONIC FILING

Dave Danner, Executive Director & Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
Post Office Box 47250
Olympia, Washington 98504-7250

Re: Revised Applicability to Rate Schedules 1 and 2

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or the “Company”), files herewith the following revision to its Tariff WN U-6 stated to become effective on and after **May 16, 2011**

Nineteenth Revision of Sheet 101.1,
Rate Schedule 1,
“General Sales Service,”

and

Nineteenth Revision of Sheet 102.1,
Rate Schedule 2,
“Residential Sales Service.”

This filing revises the applicability of Rate Schedules 1 and 2 to allow certain hearth products and gas wall heaters to qualify for Rate Schedule 2 service under specified conditions. The efficiency of gas fired hearth products and wall heaters has improved, allowing either to be a good primary heating source in smaller homes. Like electric mini-split heat pumps, hearths and wall heaters can be installed in homes without duct work.

To be eligible for service under Rate Schedule 2, a residential customer must use natural gas as his/her primary source of heating or water heating. Language is added to Rate Schedule 2 establishing a hearth or wall heater as a primary residential heating source when the installed unit has a verified nameplate rating of 20,000 BTUs or

greater, and is used as the main heating source for a dwelling that is 1,500 square feet or less and is occupied year-round.

This Company recently filed Advice No. OPUC 11-1 with the Public Utility Commission of Oregon, which made the changes proposed herein effective in the Company's Oregon service territory on April 11, 2011. The Company seeks to have the same definitions in Oregon and Washington for applicability to Rate Schedules 1 and 2.

The Company respectfully requests that the tariff sheets filed herein be approved to become effective with service on and after May 16, 2011.

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

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.

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

Kelley Miller, Staff Assistant
Rates & Regulatory Affairs
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Please call me if you have any questions.

Sincerely,

/s/ Jennifer Gross

Jennifer Gross
Tariff and Regulatory Compliance

attachment