

**Rates and Regulatory Affairs**  
**Facsimile: 503.721.2516**



January 22, 2009

**VIA E-MAIL & U.S. MAIL**

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

Re: WUTC v Northwest Natural Gas Company  
Docket No. UG-080546

Dear Mr. Danner:

Northwest Natural Gas Company, d.b.a. N W Natural (NW Natural or Company) submits herein the "results of investigation into implementation of residential low-income bill assistance programs in Washington service territory" pursuant to paragraph 28 and Appendix B of the Final Order (Order No. 04) entered December 26, 2008.

NW Natural has met with representatives from Clark County and Clark Public Utilities, serving Clark County, Washington, and the Washington Gorge Action Programs, serving Klickitat and Skamania counties in Washington. Clark County is the entity that oversees the operation of low-income energy rate assistance programs in Clark County, Washington and Clark Public Utilities is on contract with Clark County to operate the low-income energy rate assistance programs in that County.

NW Natural has an existing working relationship with Clark Public Utilities and the Washington Gorge Action Programs in association with the Low-Income Home Energy Assistance Program (LIHEAP) and the Company's charitable contribution program, the Gas Assistance Program (GAP). As such, the Company's investigation explored the interest and capability of these entities to serve in the same or similar role for a new NW Natural program that would make additional funding available to the Company's residential low-income customers for bill payment assistance.

Subject to final program design and development, and contract negotiations with each entity, at this time we have an informal agreement with both Clark Public Utilities and the Washington Gorge Action Programs that they are available and willing to provide program delivery support to NW Natural for a new residential low-income bill payment assistance program.

Based on this investigation, NW Natural concludes that a new residential low-income program can be supported alongside of the existing infrastructure that supports the LIHEAP and GAP programs, and that there is no need to further investigate an alternative program delivery system.

The first meeting of the low-income rate assistance working group is scheduled for February 5, 2009 at 10:00 a.m. at the University of Oregon; White Stag Building, 70 NW Couch, Portland OR 97209.

At this time, the Company is confident in its ability to meet the April 1, 2009 deadline for filing a proposed low-income rate assistance program.

I am available to answer any questions you may have.

Sincerely,

/s/ Onita King

Onita King  
Rates & Regulatory Affairs  
[ork@nwnatural.com](mailto:ork@nwnatural.com)  
503.721.2452

cc: Service List (E-mail & U.S. Mail)