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May 27, 2016

VIA ELECTRONIC FILING

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

**RE: NW Natural's Washington Pipeline Replacement Plan
PG - _____ - related to Docket UG-120715 and PG-131840**

Northwest Natural Gas Company, dba NW Natural ("NW Natural" or the "Company") hereby submits an original and two copies of its Washington Pipeline Replacement Plan. This filing is pursuant to the Commission's Order 02 in PG-131840.

Although the Company is not taking part in the option for a cost recovery mechanism, due to the lack of a need to make significant safety-related pipeline replacements in Washington, NW Natural recently became aware that the Commission's order indicates that the Company should file an updated replacement plan in any event. NW Natural submits this filing in response to that order, albeit on a delayed basis. Please feel free to contact me if there are any questions or follow up needed in this regard.

The Pipeline Replacement Plan provides an update on the replacement of NW Natural's pipeline facilities.

If you have any questions, please contact me at (503) 226-4211, extension 5865.

Sincerely,

/s/ Gail A. Hammer

Gail A. Hammer
Rates & Regulatory Affairs

Enclosures