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May 11, 2018

***VIA ELECTRONIC FILING***

Mark L. Johnson  
Executive Director and Secretary  
State of Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, Washington 98504-7250

**RE: Docket A-130355: NW Natural's Comments – Rulemaking on Procedural Rules Chapter 480-07 WAC, Parts III C-IV**

Dear Mr. Johnson,

Northwest Natural Gas Company (“NW Natural” or “the Company”) submits these comments in response to the Notice of Opportunity to respond to Small Business Economic Impact Statement (SBEIS) Questionnaire with analysis of whether the draft rules impose a cost impact on the Company issued on April 11, 2018.

NW Natural appreciates the opportunity to provide comments in this rulemaking. The Company does not see a cost impact as a result of the draft rules. Please feel free to contact me with any questions.

Sincerely,

/s/ Zachary D. Kravitz

Zachary D. Kravitz  
Associate Counsel  
NW Natural