

ZACHARY D. KRAVITZ
Associate Counsel
Tel: 503.220.2379
Email: zdk@nwnatural.com



July 30, 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: Comments of NW Natural Small Business Economic Impact Statement

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 the Small Business Economic Impact Statement (SBEIS) Questionnaire with analysis of whether the draft rules impose a cost impact on the Company.

NW Natural expects that the draft proposed rules WAC 480-07-160 and 480-07-420 will have an additional cost impact to NW Natural. The proposed rules will require the Company to expend additional time and resources to prepare documents for filing with the Commission and for submission to parties during the discovery process. Currently, documents are marked either “Confidential” or “Highly Confidential.” Under the proposed rules, documents must also be marked “Exempt” if the document is “exempt” pursuant to Chapter 42.56 RCW. This additional designation will add complexity to the preparation of documents for discovery and submission to the Commission. The Company expects that additional legal, paralegal, and administrative resources will need to be devoted to determining the appropriate designation(s) on each page submitted and marking the pages for submission. While it is difficult to quantify the additional costs associated with the proposed rules, the Company anticipates additional internal resources, and potentially, outside legal resources dedicated to ensuring compliance with the new proposed rules. The Company believes that the new proposed rules could double or triple the amount of time required to designate and mark documents.

NW Natural is not aware of any cost savings created by the proposed rules.

If you have any questions about the information contained in this filing, please do not hesitate to contact me.

Sincerely,

/s/ Zachary D. Kravitz

Zachary D. Kravitz
Associate Counsel
NW Natural
220 NW Second Avenue
Portland, OR 97209