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August 31, 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 - Rulemaking to Make Corrections and Changes in Rules WAC 480-07, Relating to Procedural Rules

Dear Mr. Johnson,

Northwest Natural Gas Company (“NW Natural” or “the Company”) appreciates the opportunity to submit these comments in response to the July 31, 2018 proposed amendments to WAC 480-07-160 and WAC 480-07-420.

WAC 480-07-160(6)(f); Initial Filing

NW Natural appreciates and supports the addition of this subsection allowing providers to withhold from an initial filing information that is intended to be highly confidential while waiting for a protective order to be issued.

WAC 480-07-160 (8); Spreadsheets

NW Natural appreciates the addition of this subsection allowing providers an alternative way of marking restricted information in spreadsheets if the marking requirements in subsections 480-07-160 (4)-(7) are impractical or unduly burdensome and supports its adoption.

NW Natural has concerns regarding the administrative burden and added complexity of the proposed changes to 480-07-160 and 480-07-420, which the Company has addressed in prior comments.¹ We look forward to further discussion on this issue.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Zachary D. Kravitz

Zachary D. Kravitz
Director of Regulatory Affairs
NW Natural

¹ See NW Natural comments filed on January 13, 2017 and September 29, 2017.