

LISA RACKNER Direct (503) 595-3925 lisa@mrg-law.com

February 10, 2017

Steven V. King Acting Executive Director and Secretary Washington Utilities and Transportation Commission PO Box 47250 1300 S Evergreen Park Drive SW Olympia WA 98504-7250

Re: UG- : Application of Northwest Natural Gas Company for Approval of **Corporate Reorganization to Create a Holding Company**

Attention Filing Center:

NW Natural Gas Company ("NW Natural") hereby files with the Washington Utilities and Transportation Commission (the "Commission") its Application for Approval of Corporate Reorganization to Create a Holding Company ("Application").

Please do not hesitate to contact me if you have any questions about this filing.

Very truly yours,

Lisa Rackner

CERTIFICATE OF SERVICE

Consolidated Dockets UG-____

I hereby certify that I have this 10th day of February 2017, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via Overnight and electronic mail, properly addressed as follows:

Steven V. King	Hand Delivered
Acting Secretary and Executive Director	U.S. Mail (first-class, postage prepaid)
Washington Utilities and Transportation Commission 1300 S Evergreen Park Drive SW PO Box 47250 Olympia, WA 98504-7250	xOvernight Mail (Fed Ex)Facsimile (360) 586-8203xEmail (records@utc.wa.gov)
Olympia, WA 98504-7250	

I hereby certify that I have this 10th day of February 2017, served a true and correct copy of the foregoing document upon parties of record, via electronic mail and/or U.S. Mail, properly addressed as follows:

Public Counsel

Lisa W. Gafken Office of the Attorney General 800 5th Avenue – Suite 2000 Seattle WA 98104-3188 lisaw4@atg.wa.gov

Northwest Industrial Gas Users

Chad M. Stokes Tommy A. Brooks Cable Huston LLP 1001 SW 5th Ave Ste 2000 Portland OR 97204 cstokes@cablehuston.com tbrooks@cablehuston.com

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 10th day of February 2017, at Portland, Oregon.

Wendy McIndoo

Wendy McIndoo McDowell Rackner & Gibson PC 419 SW 11th Avenue, Suite 400 Portland, OR 97205 (503) 595-3922