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VIA ELECTRONIC FILING

Dave Danner, Executive Director & Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
Post Office Box 47250
Olympia, Washington 98504-7250

Re: U- 100245 – Revised Cover Letter to NW Natural’s 2011 IRP

Northwest Natural Gas Company, dba NW Natural (“NW Natural” or “Company”) hereby issues a revised cover letter to its 2011 Integrated Resource Plan (“IRP”) filed March 31, 2011, in Washington Utility and Transportation Commission (“WUTC”) in Docket No. U-100245.

In its initial cover letter to its 2011 IRP, the Company stated that its plan included the best assumptions available when the study began in 2010. Those assumptions included a 2014 in-service date for the proposed Palomar East Pipeline as well as pricing assumptions for capacity on the pipeline. On March 23, 2011, Palomar Gas Transmission LLC filed to withdraw its application with the Federal Energy Regulatory Commission for the pipeline project. The Company continues to believe a transmission pipeline similar to the proposed Palomar East pipeline will be installed in the future. However the in-service date and the related costs for capacity will differ from what is assumed in the Company’s 2011 IRP.

NW Natural and WUTC Staff have agreed that NW Natural will supplement its March 31, 2011, filing in some manner to account for these changed assumptions. In an effort to do so, NW Natural has been diligently reviewing whether the best approach to modifying its IRP would be to change the modeling included within its current IRP or add new models runs. The Company has also tried to determine the scope of changes that will be necessary to the language of the IRP and the final document.

NW Natural is not prepared to specifically set forth the changes it will make to its IRP, but the Company has determined that it will conduct additional modeling, change the models that support its current IRP, and revise language in various parts of the IRP. NW Natural has analyzed the time that will be required to make these modifications and has concluded that they will likely be completed in late August.

Because the parties to this docket and the Commission Staff have an interest in the changes that NW Natural will make to its IRP, NW Natural plans to hold meeting in June with interested parties referred to collectively as the Technical Working Group. At this workshop, NW Natural will present and answer questions about its proposed modifications to the IRP.

NW Natural will work with the Technical Working Group to establish a time and place for a workshop to discuss the changes NW Natural will make to its IRP.

NW Natural will plan to file its revised IRP on setting September 1, 2011. As stated in its original cover letter to its IRP, the Company continues to assume that updates will need to be made to Chapter 1, Executive Summary; Chapter 3, Supply Side Resources; Appendix 3, Appendix to Chapter 3; Chapter 5, Linear Programming; and the Company's Resource Choices; and Appendix 5, Appendix to Chapter 5.

If you have any questions, please contact me at (503) 226-4211, extension 3590.

Sincerely,

/s/ Jennifer Gross

Jennifer Gross