WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Least Cost Planning Rulemaking, WAC 480-100-238 Least Cost Planning Rulemaking, WAC 480-90-238 Chapter 480-107 WAC Rulemaking Docket No. UE-030311 Docket No. UG-030312 Docket No. UE-030423

Supplemental Comments by the Cogeneration Coalition of Washington

CCW supplements its comments of May 13 in these dockets, in response to the comments of NIPPC filed in this matter. CCW supports the position of NIPPC that the procedures for competitive solicitations should be more precisely dictated by the Commission's regulations. Such procedures should ensure that the solicitation process is transparent, objective and independent.

Several states have enacted regulations with detailed procedures for solicitations. In addition, FERC and NARUC are currently investigating these areas. FERC held a technical conference on Jan. 28 in which it received significant information about the practices of various states. The link for the materials from that conference is:

http://www.ferc.gov/EventCalendar/EventDetails.aspx?ID=1544&CalType=%20&Date=1%2f28%2f2005&CalendarID=116.

FERC and NARUC are undertaking some joint study and discussion. The link for materials from that joint effort is:

http://www.naruc.org/displaycommon.cfm?an=1&subarticlenbr=413. We look forward to discussing this in more detail on June 9.

Dated June 1, 2005

Respectfully submitted,

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