

# Davison Van Cleve PC

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July 25, 2007

Mark Sidran, Chairman  
Patrick Oshie, Commissioner  
Phillip Jones, Commissioner  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 S. Evergreen Park Drive, S.W.  
Olympia, WA 98504-7250

Re: UE-060649, Standards for Interconnection to Electric Delivery Systems

Dear Commissioners:

The Industrial Customers of Northwest Utilities ("ICNU") submits this letter in support of the Washington Utilities and Transportation Commission's ("Commission") proposed amendments to WAC § 480-108 regarding interconnection standards. ICNU appreciates the opportunity it was afforded to participate in this proceeding, and thanks the Commission for considering ICNU's comments and concerns.

ICNU believes that the Commission's proposed rule amendments sufficiently promote uniformity with the interconnection rules of the Federal Energy and Regulatory Commission and helps to eliminate discrimination in the electricity market. Moreover, the Commission's proposed amendments recognize that certain upgrades to a utility's transmission system may benefit all of a utility's customers, and allows a utility to appropriately spread these costs. Ultimately, the proposed amendments will foster an open market for the sale of electricity and encourage consumers to make their generation resources available for sale which will benefit all customers.

Sincerely yours,



Melinda J. Davison