

Chad M. Stokes
(503) 721-9118
cstokes@energyadvocates.com

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VIA FEDERAL EXPRESS AND ELECTRONIC MAIL

Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: NWIGU Comments in Docket No. UG-010522

Dear Ms. Washburn:

The Northwest Industrial Gas Users (“NWIGU”) respectfully submits these initial comments on the rulemaking in Docket No. UG-010522 to establish the fee methodology to fund the pipeline safety program as required by Substitute Senate Bill 5182 (“SSB 5182”). On April 25, 2001, the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) initiated this rulemaking by filing a Preproposal Statement of Inquiry (“CR-101”) with the Code Reviser. The intent of SSB 5182 is to ensure a sustainable, comprehensive pipeline safety program and establish permanent funding through the collection of a regulatory fee. The Commission has invited initial comments which must be filed by May 10, 2001.

NWIGU is a nonprofit association comprised of thirty-one industrial users of natural gas with major facilities in the states of Washington, Oregon and Idaho. Some NWIGU members own gas facilities that directly connect their plants to the interstate pipeline. Therefore, NWIGU has a direct and substantial interest in these proceedings.

NWIGU plans to participate in the workshop on May 17, 2001, to discuss the proposed rule language for the fee methodology and all future workshops or proceedings. NWIGU would also like to submit additional comments after we receive and have had an opportunity to review Staff’s draft rulemaking proposal. Finally, NWIGU would like the opportunity to respond to comments submitted by other parties involved in the rulemaking.

Please include the following persons on the mailing list for communications regarding this docket:

Edward A. Finklea
Energy Advocates LLP
526 NW 18th Ave.
Portland, OR 97209
(503) 721-9118
(503) 721-9121 (fax)
E-mail:
efinklea@energyadvocates.com

Paula Pyron
Northwest Industrial Gas Users
4113 Wolf Berry Court
Lake Oswego, OR 97035-1827
(503) 636-2580
(503) 636-0703 (fax)
E-mail
ppyron@nwigu.org

NWIGU looks forward to continuing an active role in the WUTC's deliberations in this rulemaking and working with WUTC staff and other parties to provide constructive assistance in addressing this topic. Please inform us of any future workshops or proceedings that may be planned.

Respectfully Submitted,

Chad M. Stokes
Edward A. Finklea
Counsel for the Northwest
Industrial Gas Users
Energy Advocates LLP
526 NW 18th Ave.
Portland, OR 97209
Tel: (503) 721-9118
Fax: (503) 721-9121