

# Davison Van Cleve PC

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com

Suite 400  
333 SW Taylor  
Portland, OR 97204

October 14, 2005

*Via Electronic Mail*

Mr. Dick Byers  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
PO Box 47250  
Olympia, WA 98504-7250

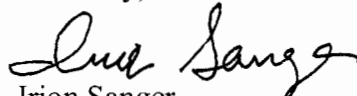
Re: Interconnection Standards Rulemaking  
**Docket No. UE-051106**

Dear Mr. Byers:

The Industrial Customers of Northwest Utilities ("ICNU") is not submitting any formal comments at this time regarding the Washington Utilities and Transportation Commission's ("Commission") notice of inquiry that is considering establishing regulations to govern interconnection of customer-owned generation facilities to electric utility delivery systems. It is ICNU's understanding that the Washington investor-owned and publicly-owned utilities are preparing comments and may propose new interconnection standards. ICNU intends to participate and may submit comments later in this proceeding after draft interconnection standards and/or rules are prepared.

If the Commission decides to adopt new interconnection regulations, then ICNU believes that the Commission should review how the new regulations would impact existing interconnection agreements for customer-owned generation facilities. ICNU does not identify any other specific issues at this time; however, due to the fact that this proceeding is in its early stages and draft standards have not been prepared, ICNU may raise additional issues later in this proceeding.

Sincerely,

  
Irion Sanger