

October 25, 2005

VIA ELECTRONIC FILING & FIRST CLASS MAIL

Carole Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

RE: Proposed bidding rules
Docket No. UE-030423
Proposed Rules Adoption Hearing November 9, 2005

Dear Ms. Washburn:

While some of Public Counsel's previously suggested changes to WAC 480-107 have not been adopted we support the adoption of the changes the Commission has made. We also agree with Commission Staff's observation in their Open Meeting Memo of September 28, 2005 that waiting to determine the need to alter requirements regarding QFs till after implementation of changes to Federal PURPA Statute due to the Energy Policy Act of 2005 is a more informed and orderly approach.

Public Counsel supports the inclusion of the CO2 and environmental effects in the bid evaluation process and commends the Commission for including those costs in the bid evaluation.

Sincerely,

STEVE JOHNSON
Analyst
Public Counsel
(206) 464-6253