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February 2, 2004

VIA EMAIL, FACSIMILE AND EXPRESS MAIL

Ms. Carole J. Washburn
Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

ATTENTION: Sondra Walsh, Senior Policy Strategist

Re: Substitute Pages, Petition of BP Pipe Lines (North America) Inc., Docket No. PL-040123

Dear Ms. Washburn:

Enclosed are revised pages to the petition of BP Pipe Lines (North America) Inc. and to Exhibit "C" to that Petition. The petition and exhibit were originally filed with the Commission on January 27, 2004. Docket No. PL-040123 has been assigned to this filing. No substantive changes are contemplated by these revised pages. Instead, the petitioner is simply providing written information in response to a Staff request for additional details concerning the procedures BP would follow in raising the Ferndale natural gas pipeline at a higher maximum operating pressure. The revisions also correct a couple typographical errors in the original submittal.

Thank you very much for your assistance in this matter.

Very truly yours,

Davis Wright Tremaine LLP

/s/ John A. Cameron

John A. Cameron

JAC:smp
Enclosures