

NORTHWEST INDUSTRIAL GAS USERS

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Submitted via Electronic Filing to Records@wutc.wa.gov

Ms. Carole J. Washburn
Secretary
Washington Utilities & Transportation Commission
1300 South Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Rulemaking to Consider Possible Correction and Changes to Selected rules in Chapter 480-93 WAC, Gas Companies – Safety, Docket No. PG-050933

Dear Ms. Washburn:

In response to the Commission's August 5, 2005 Notice of Opportunity to File Written Comments in the above-captioned proceeding, the Northwest Industrial Gas Users (NWIGU) understands the scope of this proceeding to be clarification of the recently revised gas safety rules, i.e., a limited "tune-up," but not to include major policy revisions. At this time NWIGU does not have any substantive concerns with the revisions that it understands to be contemplated by Staff and does not have additional clarification revisions to propose at this time. NWIGU would request the opportunity for future comment when the scope of all revisions is more fully defined.

NWIGU is a non-profit association comprised of thirty-two 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 in Washington to the Williams' Northwest interstate pipeline. These operators' intrastate gas pipelines are accordingly subject to safety regulation by the WUTC. In addition for those NWIGU members who take service behind the utilities, industrial customers are also impacted in scope and cost by any changes in the Commission's safety regulation of local distribution company service.

NWIGU accordingly requests that you include it on the distribution list for service in this docket as follows:

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Respectfully submitted,

/s/

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cc E. Finklea
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