

NORTHWEST INDUSTRIAL GAS USERS

4113 Wolf Berry Court
Lake Oswego, OR 97035-1827

Phone: (503) 636-2580
Facsimile: (503) 636-0703

Paula E. Pyron
Executive Director

E-mail: ppyron@nwigu.org

November 27, 2007

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

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

RE: Rulemaking to Consider Amending WAC 480-93, Relating to Gas Companies - Safety, Docket PG-070975, *Comments of the Northwest Industrial Gas Users*

Dear Ms. Washburn:

In response to the Commission's October 26, 2007 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 Commission's gas safety rules to incorporate passage of Substitute Senate Bill 5225 during the 2007 legislative session as well as to add additional time for invoice processing for the Commission's pipeline safety assessments.

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 revisions to propose. NWIGU supports the fee setting and invoicing schedule changes proposed by the Staff and believes the contemplated rule revisions reflect the provisions of Substitute SB 5225.

If additional rule revisions are brought forward in this docket, NWIGU respectfully reserves the right to make additional comments.

NWIGU is a non-profit association comprised of thirty-five 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 interstate pipeline systems. 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 natural gas service.

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

Paula E. Pyron
Executive Director
Northwest Industrial Gas Users
4113 Wolf Berry Court
Lake Oswego, OR 97035-1827
Telephone: 503.636-3865
Facsimile: 503.636-0703
E-Mail: ppyron@nwigu.org

Respectfully submitted,

/s/

Paula E. Pyron
Executive Director
Northwest Industrial Gas Users

cc E. Finklea
C. Stokes