

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of the Consideration of)	
Establishing a New Chapter Applicable to)	Docket Nos. A-021178 and
the Economic Regulation of Hazardous)	TO-030288
Liquid Pipeline Companies Regulated as)	
Common Carriers by the Commission)	
_____)	

COMMENTS OF TESORO REFINING AND MARKETING COMPANY

1 Tesoro Refining and Marketing Company (“Tesoro”), by and through its attorneys, Brena, Bell & Clarkson, P.C., pursuant to the Washington Utilities and Transportation Commission’s (“WUTC”) Notice of Opportunity to Submit Written Comments on Proposed Rules, issued on December 23, 2004, hereby files its comments with respect to “revisions to the financial reporting rules.”

2 In accordance with WAC 480-09-420(3), the name and address of the pleading party is set forth below. Please direct all service and correspondence regarding the above-captioned docket to the following:

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3 Tesoro has reviewed the final version of the Proposed Rules, issued on December 23, 2004, which would apply to common carrier hazardous liquid pipeline companies (“pipeline companies”) within the State of Washington. Tesoro notes that the current version of the proposed rules require much less reporting than the prior versions upon which Tesoro

previously commented. As such, the parties in regulatory proceedings may have to pursue relevant information through the discovery process that could have been provided through the annual reporting process contemplated in the proposed rules. Nevertheless, Tesoro believes that the final version of the proposed rules is a significant step forward in the financial regulation of pipeline companies and other regulated entities in the State of Washington. Had the final version of the proposed regulations been in effect a few years ago, Tesoro, this Commission, and other parties would have saved significant resources in the discovery process in both the interim rate proceeding and the general rate proceeding involving a pipeline company.

4 Tesoro supports the Commission's efforts to strengthen the regulatory reporting requirements for pipeline companies. Regulatory reporting minimizes the use of administrative resources in litigated proceedings and enables ratepayers to evaluate in advance the nature and extent of costs that are being included in rates. Tesoro believes the proposed rules will assist the Commission in its efforts to efficiently regulate pipeline companies and will assist the ratepayers in their efforts to efficiently review the ongoing operations of the pipeline companies they use for common carrier transportation of their products.

DATED this 19th day of January, 2005.

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By _____
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