



January 10, 2007

Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250
Attn: Carole J. Washburn, Executive Secretary

**SUBJECT: REF. NO. DOCKET PL-061026
WRITTEN COMMENTS ON POSSIBLE RULE CHANGES TO WAC 480-75**

Dear Ms. Washburn:

McChord Pipeline Co. appreciates the opportunity to be involved in the rulemaking process regarding potential changes to the selected rules mentioned in this Docket. McChord Pipeline Co. has the following comment regarding the proposed changes in the rule:

1) McChord Pipeline Co. feels the annual reporting requirement in WAC 480-75-650 (2) needs further clarification. We believe that the intent is to have the operators continue to complete a standardized form (presently Form 024-025) that is provided by the commission yearly which requires all the information listed in the WAC section as revised. We feel that as worded this section leaves open to interpretation the definition of a "report" and the amount of detail required. We recommend the following to be considered for wording of WAC 480-75-650 (2) (changes shown bold):

A report **form** titled, "Hazardous Liquid Annual Report Form" **which can be obtained from the Pipeline Safety Section of the commission.** The annual report must include....

Thank-you for the opportunity to participate in this process. McChord Pipeline Co. remains committed to working and being involved with WUTC to insure the safe operation of our pipeline.

Sincerely,

McChord Pipeline Co.


Alan J. Cabodi
President

cc : RWS, GAH, JPW, TJG

WUTC RULESCOMMENT107.DOC