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August 27, 2004

Mr. Alan E. Rathbun
Pipeline Safety Director
WA Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: UG-011073, WAC 480-93 Rule Revisions

Dear Mr. Rathbun:

Avista Utilities appreciates the opportunity to make final recommendations to the proposed WAC 480-93 Rule revisions.

Avista would like to propose that WAC 480-93-100 "Valves" be amended to allow for alternate valve selection and maintenance procedures. Perhaps a new line item, "Alternative valve installation and maintenance procedures may be approved as agreed upon between the Commission and the Operator".

For example, Avista believes that the requirement to install emergency valves on all commercial buildings within business districts as required in 3(b) may not substantially increase public safety as quick egress is not a problem at most commercial establishments. We might suggest that a viable alternative to this requirement would be our existing procedures to install them only on services to churches, schools, and hospitals as required in 3(a). We would continue to maintain these annually. In addition, we would propose to adopt a maintenance program for our secondary (non-emergency) valves.

We believe that for Avista Utilities, maintaining secondary valves more directly enhances public safety. We would prefer to apply our resources toward this effort rather than mandatory construction and maintenance of valves on all commercial services.

Thank you again for the opportunity for input.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Mike Faulkenberry".

Mike Faulkenberry
Chief Gas Engineer

C: File