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August 27, 2004

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

**Subject: Docket No. UG-011073 – Proposed Rule Making, CR-102**

Dear Ms. Washburn:

Thank you for the opportunity to comment upon the subject proposed rules.

Cascade Natural Gas Corporation (Cascade) submitted comments regarding the content of the proposed rules during earlier phases of the proposed rulemaking. Please refer to those comments in regards to this stage of the rulemaking.

Cascade requests that the effective date for newly accepted rules include consideration for the effort required by all operators to implement practices conforming with the new requirements. Compliance with all the proposed rules will take considerable resources to implement considering the number and scope of the proposed rule changes. Operators should be given explicit instruction on the implementation date for all rules as a whole, or individually. We suggest that the effective date for all proposed rules be December 31, 2005, unless otherwise specifically designated, so that each operator can comply with the requirements.

Cascade requests that the “retroactivity” of all design rules be stated as part of the final rule. Some of the proposed design and construction rules state applicable dates, such as 480-93-115 Casing of pipelines. Other proposed design and construction rules do not state applicable dates, such as 480-93-100 Valves. The inclusion of the applicable date in 480-93-115 Casing of pipelines is a proposed change. This change was incorporated to clarify the interpretation of the rule. Similar confusion can be avoided by clarifying the applicable dates of all rules before implementation. We suggest that all proposed design and construction rules explicitly state the applicable dates so operators can comply with the requirements.

If you have questions regarding the report, please contact Keith Meissner at (206) 381-6734.

Sincerely,  
CASCADE NATURAL GAS CORPORATION

Will Odell  
Chief Operating Officer

*We make warm neighbors*