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VIA FIRST CLASS AND ELECTRONIC MAIL

Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: NWIGU Comments in Docket No. UG-030312

Dear Ms. Washburn:

The Northwest Industrial Gas Users (“NWIGU”) respectfully submit these initial comments on the rulemaking in Docket No. UG-030312, to review Chapter WAC 480-90-238, Least-cost planning. On April 15, 2003, the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) initiated this rulemaking by filing a Preproposal Statement of Inquiry (“CR-101”) with the Code Reviser. The Commission has invited initial comments, which must be filed by May 16, 2003.

The NWIGU is a non-profit association comprised of thirty-two end-users of natural gas with major facilities in the States of Oregon, Washington, and Idaho. NWIGU members include diverse industrial interests, including food processing, pulp and paper, wood products, electric generation, aluminum, steel, chemicals, electronics, and aerospace. The association provides an informational service to its members and participates in various regulatory matters that affect member interests. NWIGU member companies purchase sales and transportation services from local distribution companies (“LDCs”) regulated by the WUTC. Since least-cost planning affects the acquisition decisions of LDCs in Washington, NWIGU has an interest in this rulemaking.

NWIGU does not have any specific rulemaking proposals that it desires to submit at this time, but plans to participate in the workshop on June 13, 2003,

to discuss any proposed rule revisions and all future workshops or proceedings. NWIGU would also like to submit additional comments after we receive and have had an opportunity to review any draft rulemaking proposal submitted by Staff. Finally, NWIGU would like the opportunity to respond to comments submitted by other parties involved in the rulemaking.

Please include the following persons on the mailing list for communications regarding this docket:

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NWIGU looks forward to participating in the WUTC's deliberations in this rulemaking and working with WUTC staff and other parties to provide constructive assistance in addressing this topic. Please inform us of any future workshops or proceedings that may be planned.

Respectfully Submitted,

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Of Attorneys for the Northwest
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