



Avista Utilities
1411 East Mission P.O. Box 3727
Spokane, WA 99220-3727
Telephone 509-489-0500
Toll Free 800-727-9170
www.avistautilities.com

September 19, 2005

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

Subject: Notice of Opportunity to File Written Comments on Docket PG-050933
Rulemaking to Consider Possible Correction and Changes to Selected Rules
In Chapter 480-93 WAC, Gas Companies – Safety

Dear Ms. Washburn:

Thank you for the opportunity to comment on the proposed changes to selected rules in Chapter 480-93 WAC identified in the CR-101 notice. Avista offers the following comment in regard to WAC 480-93-200 (6)(c) Reporting Requirements for Operators of Gas Facilities.

This rule requires submission of an annual report detailing data with regard to all construction defects and material failures as it relates to pipeline leakage. The rule specifically states, "Operators must categorize the different types of construction defects and material failures anticipated for their system."

Avista believes it would be beneficial to the Commission, as well as the Operators, if the Commission created a standard form specifically listing the categories, and other pertinent information, the Operators will be required to submit on an annual basis.

Please direct any questions in regard to this matter to Linda Burger at (509) 495-4423.

Sincerely,

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

Michael J. Faulkenberry
Chief Gas Engineer

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c: File

