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May 31, 2001

VIA FEDERAL EXPRESS AND ELECTRONIC MAIL

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

Re: Docket No. UG-010522

Dear Ms. Washburn:

The Northwest Industrial Gas Users (“NWIGU”) respectfully submit these comments on the rulemaking in Docket No. UG-010522. On April 25, 2001, the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) filed a Preproposal Statement of Inquiry (“CR-101”) with the Code Reviser. The purpose of CR-101 is to initiate a rulemaking establishing the fee methodology by which to fund the pipeline safety program as required by Substitute Senate Bill 5182 (SSB5182). The Commission has invited the filing of comments by May 31, 2001.

NWIGU is a nonprofit association comprised of thirty-one industrial users of natural gas with major facilities in the states of Washington, Oregon and Idaho. Some NWIGU members own gas facilities that directly connect their plants to the interstate pipeline. Many of our members take service from local distribution companies (“LDCs”) in Washington. Therefore, NWIGU has a direct and substantial interest in these proceedings.

NWIGU recommends the Commission determine annually the direct assignment of average costs associated with a company’s standard inspections. WAC § 480-93-999(1)(b)(i). Once the program has been in operation, the Commission should be able to determine more accurately the number of days necessary to complete inspections. If the language “which shall be determined annually” is added to WAC 480-93-999 (1)(b)(i), NWIGU’s concern would be

addressed. The attached language change to the most recent red-lined version of the proposed rule is our suggested way of addressing our concern.

Please forward any additional information regarding this docket to:

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NWIGU looks forward to continuing to play an active role in the WUTC's deliberations in this rulemaking and working with WUTC staff and other parties to provide constructive assistance in addressing this topic.

Respectfully Submitted,

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