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January 24, 2000

Via Messenger and E-mail

Secretary
Washington Utilities & Transportation Commission
Washington Utilities & Transportation Commission
P.O. Box 7250
1300 S. Evergreen Park Drive SW
Olympia, WA 98467-47250

Re: *In the Matter of Rulemaking Concerning Special Contracts for Electric, Water
and Natural Gas Utilities*
Docket No.: U-001928
WAC 480-80-335

Dear Madam Secretary:

Please find enclosed the original and ten copies of written comments of ARCO Products Company with regard to the above-referenced Commission rulemaking concerning WAC 480-80-335. I apologize for any inconvenience caused by submission of these comments on behalf of ARCO Products Company several days after the January 14th date specified in the Notice of Rulemaking Workshop. It was necessary for me to coordinate with the busy schedules of several of my clients prior to finalizing the comments. Thank you for your consideration of the enclosure. Please call the undersigned if you have any questions.

Very truly yours,

Davis Wright Tremaine LLP

Richard W. Elliott

RWE:jjk

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Enclosures

cc: Michael Myers, Esq. (w/encl.)
Glenn Butler (w/encl.)
John Cameron (w/encl.)