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March 31, 2005

Sondra Walsh
Senior Policy Strategist
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
P. O. Box 47250
Olympia, Washington 98504-7250

Subject: NW Natural's Comments Regarding Proposed Pipeline Safety Rulemaking
(Chapter 480-93 WAC, Docket No. UG-011073)

Dear Ms. Walsh,

NW Natural appreciates the opportunity to provide additional comments on the proposed Gas Pipeline Safety Rulemaking under consideration for Chapter 480-93 WAC, Docket No. UG-011073. The company has previously submitted numerous comments for this docket.

Staff electronically posted additional revisions to the proposed pipeline safety rules immediately prior to the adoption hearing scheduled for March 31. As a result, operators have not had adequate time to review the proposed rules and provide meaningful comments before the adoption hearing. NW Natural respectfully requests that Staff grant operators sufficient time to review and prepare comments to the latest draft of the proposed rules before they are considered for adoption.

NW Natural is strongly committed to pipeline safety, to the safety of our customers and the general public, and to the reliable and cost-effective delivery of natural gas services. For the past 146 years, NW Natural has been a leader in the industry, voluntarily implementing new pipeline safety programs that significantly improve the safety of our customers and the communities that we serve.

Although NW Natural has worked closely with Staff throughout this rulemaking process to provide comments supporting the development of pipeline safety regulations that are practical, while furthering our mutual goal of pipeline safety, NW Natural believes that there are a number of proposed rules where the intent is unclear and others where the implementation will require the dedication of significant financial resources by Washington State operators without a corresponding benefit in pipeline safety. NW Natural would be pleased to discuss these concerns in more detail with Staff.

Finally, NW Natural believes that any real improvement in natural gas pipeline safety must include an increased emphasis on third party damage prevention and enforcement. At the Department of Transportation public meeting conducted on December 16, 2004 in

Washington, D.C., a new American Gas Foundation study confirmed that the single greatest threat to the natural gas distribution infrastructure is third party damage. NW Natural believes that this fact underscores the need for additional emphasis on damage prevention and enforcement, and strongly encourages Staff to pursue enhanced damage prevention legislation in the State of Washington.

Thank you again for the opportunity to comment on the proposed pipeline safety rules.

Sincerely,

Bruce L. Paskett, P.E.
Chief Engineer

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