

**ENERGY
ADVOCATES LLP
Attorneys At Law**

526 NW 18TH AVENUE
PORTLAND, OR 97209-2220
Phone: (503) 721-9118
Fax: (503) 721-9121

1500 K STREET, NW
SUITE 330
Washington, DC 20005
Phone: (202) 371-9889
FAX: (202) 371-9025

www.energyadvocates.com

Edward A. Finklea
(503) 721-9118
efinklea@energyadvocates.com

September 10, 2001

VIA FEDERAL EXPRESS 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-011073

Dear Ms. Washburn:

The Northwest Industrial Gas Users (“NWIGU”) respectfully submits these initial comments on the rulemaking in Docket No. UG-011073 to review Chapter WAC 480-93 Gas Companies – Safety. On August 9, 2001, 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 September 12, 2001.

NWIGU is a nonprofit association comprised of thirty-two 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. Therefore, NWIGU has a direct and substantial interest in these proceedings.

NWIGU does not have any specific rulemaking proposals that it desires to submit at this time, but plans to participate in the workshop on September 25, 2001, 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:

Edward A. Finklea
Energy Advocates LLP
526 NW 18th Ave.
Portland, OR 97209
(503) 721-9118
(503) 721-9121 (fax)
E-mail:
efinklea@energyadvocates.com

Paula Pyron
Northwest Industrial Gas Users
4113 Wolf Berry Court
Lake Oswego, OR 97035-1827
(503) 636-2580
(503) 636-0703 (fax)
E-mail
ppyron@nwigu.org

NWIGU looks forward to continuing 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. Please inform us of any future workshops or proceedings that may be planned.

Respectfully Submitted,

Edward A. Finklea
Chad M. Stokes
Energy Advocates LLP
526 NW 18th Ave.
Portland, OR 97209
Tel: (503) 721-9118
Fax: (503) 721-9121

Of Attorneys for the Northwest
Industrial Gas Users