June 13, 2000

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

Re: Special Contracts Rulemaking - Docket No. U-991928 Comments on Revised Rules WAC 480-80-335

Dear Ms.Washburn:

The Industrial Customers of Northwest Utilities ("ICNU") submits the following comments in response to the Washington Utilities and Transportation Commission's ("WUTC" or "Commission") Notice of Opportunity to Comment on the Revised Rules, dated May 11, 2000, in the above-referenced Docket.

ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest, with offices in Portland, Oregon. A list of the forty-three ICNU members is included as Attachment A. ICNU previously submitted comments in this proceeding in letters dated January 14, 2000, and February 25, 2000.

ICNU supports the proposed revisions to WAC § 480-80-335, and urges the Commission to adopt the proposed rules associated with special contracts in this Docket. ICNU believes that the amendments to the special contracts rules are essential to allow the public to effectively evaluate discrimination issues.

Carole J. Washburn, Secretary June 13, 2000 Page 2

Thank you for the opportunity to submit comments on the proposed rule for WAC § 480-80-335. Please contact us if you have any questions.

Sincerely yours,

Melinda J. Davison

Attachment

## Appendix A

## **INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

**Agilent Technologies** Air Liquide Air Products Atlantic Richfield BFGoodrich Kalama, Inc. Bellingham Cold Storage **Birmingham Steel** Boeing **Boise Cascade** Coastal St. Helens Chemical Daishowa America Davidson Industries, Inc. Eagle-Picher Minerals, Inc. Equilon Enterprises LLC **Evanite Fiber** Fort James Corp. Georgia-Pacific Hewlett-Packard Inland Empire Paper Co. Intel **International Paper** J.R. Simplot James Hardie Gypsum, Inc. Kimberly-Clark Corporation Lamb-Weston Longview Fibre Nabisco, Inc. Norpac Foods **Oregon Steel** PCC Structurals, Inc. Pioneer Americas, Inc. Ponderay Newsprint Co. Pope and Talbot, Inc. Potlatch Corporation Simpson Paper Simpson Timber Smurfit Newsprint Sonoco Products Company Tesoro Northwest Company Wah Chang West Linn Paper Company Weyerhaeuser Willamette Industries