

June 16, 2004

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RE: Docket Nos. UE-030311 / UE-030423 / UG-030312

Dear Ms. Washburn:

The Northwest Independent Power Producers Coalition (NIPPC), the Natural Resources Defense Council (NRDC), the NW Energy Coalition (NWEC), and the Renewable Northwest Project (RNP) participated in the early stages of this docket. Three of our organizations submitted initial comments over a year ago, on May 16, 2003. We participated in a stakeholders' meeting a year ago, on June 13, 2003. As of this writing, however, Commission Staff has not consulted further with our organizations or advanced draft rules.

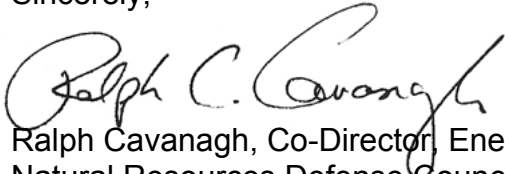
We are writing to alert the Commission that in the intervening months a number of developments have surfaced that are very significant to the topics to be addressed in this rulemaking. These developments include the lessons learned in Northwest investor owned utilities' recent integrated resource planning exercises and in several significant procurement efforts. In addition, recognizable trends have continued to mature such as the volatility of natural gas prices and the need to remove financial biases that discourage utilities from entering into power purchase agreements.

These and other important issues warrant further exploration and analysis by the Commissioners prior to issuance of draft rules. We therefore urge the Commission to schedule this matter for an open meeting so that Commissioners and staff can hear first-hand about recent developments of direct relevance to this docket. The open meeting could take the form of another stakeholder workshop, or a recessed Wednesday morning meeting, or any other form that the Commission feels is appropriate.

We urge the Commissioners to hear the most current information, rather than relying on stakeholder input over a year old, prior to the issuance of a draft rule.

We greatly appreciate your consideration of our views.

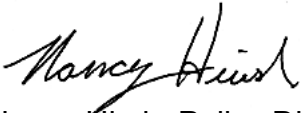
Sincerely,



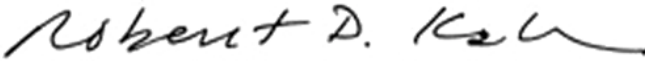
Ralph Cavanagh, Co-Director, Energy Program
Natural Resources Defense Council



Ann English Gravatt, Senior Policy Associate
Renewable Northwest Project



Nancy Hirsh, Policy Director
NW Energy Coalition



Robert D. Kahn, Executive Director
Northwest Independent Power Producers Coalition

Cc: Chairwoman Showalter
Commissioner Hemstad
Commissioner Oshie