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April 4, 2002

Douglas Kilpatrick, P.E.
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

Subject: Comments regarding proposed revisions to Washington pipeline safety rules,
WAC Chapter 480-93 (UG-011073)

Dear Mr. Kilpatrick:

NW Natural, Avista Utilities, and Cascade Natural Gas are pleased to provide the attached comments to the proposed revisions of WAC Chapter 480-93. We have carefully reviewed the discussion draft of the proposed pipeline safety rules relating to Operation and Maintenance. Our comments are based on our commitment to pipeline safety and the safe and reliable delivery of natural gas to our customers.

We look forward to the opportunity to discuss our comments regarding the proposed revisions to the first group of pipeline safety rules, General Rules, Design, and Construction, submitted February 6, 2002, and the enclosed comments regarding proposed revisions to Operation and Maintenance rules. We propose a conference with WUTC pipeline safety staff and the Washington natural gas distribution operators at your earliest convenience.

Sincerely,

Bruce L. Paskett, P.E.
Chief Engineer

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