



Avista Corp.

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March 24, 2014

Via Electronic Mail

Steven V. King
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket No. PG-140105 - Comments of Avista Utilities on the “Rulemaking to consider amending WAC 480-93-223, increasing the maximum civil penalty for violations involving gas pipeline operators.”

Dear Mr. King,

Avista Corporation dba Avista Utilities (Avista or Company) submits the following comments in accordance with the Washington Utilities and Transportation Commission’s (Commission) Notice of Opportunity to Submit Written Comments (Notice) issued in Docket PG-140105.

BACKGROUND

On February 21, 2014, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider amending WAC 480-93-223, a rule relating to “Gas Companies – Safety”. Specifically to increase the maximum civil penalty for violations involving gas pipeline operators, in an effort to adopt the more stringent administrative civil penalties set in federal pipeline safety rules. The Commission filed the CR-101 under the above referenced Docket No.

Effective on January 3, 2012, the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 (Pub. L. 112-90) (the Act) increased the maximum administrative civil penalties for

violation of the pipeline safety laws and regulations from \$100,000 to \$200,000 for each violation, and the maximum penalty for a related series of violations from \$1,000,000 to \$2,000,000 in conformance with the 2011 Act.

AVISTA COMMENTS

Avista does not take any issue with the proposed rulemaking to consider amending WAC 480-93-225.

The Company appreciates the opportunity to provide comments. If you have any questions please contact me at 509-495-4975 or at linda.gervais@avistacorp.com.

Sincerely,

/s/Linda Gervais/

Manager, Regulatory Policy
Avista Utilities
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