

**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

Chad M. Stokes
(503) 721-9118
cstokes@energyadvocates.com

April 4, 2002

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:

In response to the Washington Utilities and Transportation Commission's ("WUTC" or "Commission's") March 14, 2002 Notice of Opportunity to File Written Comments upon the Draft Rules on Operation and Maintenance in the above referenced proceeding, the Northwest Industrial Gas Users ("NWIGU") submit the following initial comments:

1. NWIGU is in general agreement with the concerns raised by Industrial Gas Services, Inc. in its March 25, 2002 comments on this draft section concerning Operation and Maintenance.

2. In proposed WAC 480-93-015, NWIGU is unclear as to what sections of 49 CFR Part 192.625 are being excluded by "excluding sections (b)(1) and section (3)." Would Staff please clarify what is being proposed for an odorization requirement that is different than federal standards? Is it b(1) and b(3) of 49 CFR Part 192.625? NWIGU would generally prefer that the state rules be consistent with the federal requirements whenever possible, but if the final rules include a different standard than the federal requirements, it would also be beneficial to spell that difference out in substance.

3. Is proposed WAC 480-93-018 (3) intended to be a record update requirement or a filing requirement with the Commission? NWIGU recommends a record update requirement open for Staff inspection during audit.

NWIGU respectfully reserves the right to make additional comments when all sections of the proposed new rulemaking draft are available, so that the precise scope of a particular proposal can be reviewed in context.

If you have any questions on these comments, please do not hesitate to call Paula Pyron, Executive Director of NWIGU at (503) 636-2580 or Ed Finklea at (503) 721-9118.

Respectfully Submitted,

Chad M. Stokes
Edward A. Finklea
Of Attorneys for the Northwest Industrial
Gas Users
Energy Advocates, LLP
526 NW 18th Avenue
Portland, OR 97209
Tel: (503) 721-9118
Fax: (503) 721-9121