



CABLE HUSTON^{LLP}

CHAD M. STOKES

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September 18, 2015

VIA ELECTRONIC MAIL

Mr. Steven V. King
Executive Director & Secretary
Washington Utilities & Transportation Commission
1300 S Evergreen Park Drive, SW
Olympia, WA 98504-7250

Re: Investigation of Natural Gas Infrastructure Expansion - Docket No. UG-143616

Dear Mr. King:

Pursuant to the Notice of Opportunity to File Written Comments dated August 20, 2015, Northwest Industrial Gas Users ("NWIGU") submit these comments in the above referenced investigation of natural gas infrastructure expansion. NWIGU appreciates the opportunity to provide comments on potential future efforts by the Washington Utilities & Transportation Commission ("Commission" or "WUTC") to expand the natural gas infrastructure to under-served areas.

The Commission's questions are company specific and ask questions about currently-filed line extension policies. NWIGU will therefore not provide specific comments that are directed at the local distribution companies ("LDC"), but does offer the following general comments we believe should inform the Commission's investigation.

While some of the line extension policies are dated and need to be revised and updated, NWIGU urges the Commission to adhere to well-established ratemaking principles like cost-causation when considering changes to line extension policies. Existing ratepayers have paid the full cost of being connected to their local distribution system. Those customers who are already part of the system should not be required to subsidize new service for new customers. In other words, existing customers should not be expected to pay additional costs for service they are already receiving in order to extend service to new customers. An LDC can certainly revise a line extension policy to increase the margin allowance and increase the timeline under which the margin allowance is calculated to offset the costs for new customers, and NWIGU would support that approach. Existing ratepayers, however, should not subsidize new investments for new customers that will benefit only the local distribution company's investors and its new customers.

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NWIGU appreciates the opportunity to participate in this docket.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Chad M Stokes', with a long horizontal flourish extending to the right.

Chad M Stokes

CMS/sk

4812-2019-4344, v. 1