



December 19, 2013

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State of Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive SW  
PO Box 47250  
Olympia, WA 98504-7250

Re: Rulemaking to Consider Possible Corrections and Changes in  
Rules in WAC 480-07, Relating to Procedural Rules  
Docket A-130355  
Our File No.: UNI45-6

Dear Sir or Madam:

On behalf of Union Pacific Railroad Company, we submit the following comments on the November 14, 2013, draft revisions to the WUTC's procedural rules.

We endorse many of the proposed changes, for example the change to WAC 480-07-145 that provides for submitting one original and one paper copy, as opposed to twelve paper copies, of certain pleadings.

We question, however, the necessity of electronically submitting documents in both pdf and native format, as would continue to be required under WAC 480-07-140(5)(b). It isn't clear what is perceived as the benefit of receiving documents in hard copy, electronically as a pdf, and electronically in native format. It is definitely more burdensome on the sender to transmit documents in these multiple ways. As the recipient, we haven't welcomed getting documents three ways. At a minimum, we would suggest that parties to adjudicative proceedings have the discretion to agree on how many formats are needed and what formats will be acceptable.

In addition, we suggest the WAC 480-07-140(1)(b) be modified to encourage but not require use of the web portal for electronic filings in



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adjudicative proceedings. Such a change would be consistent with WAC 480-07-145(2) which requires electronic filings “through the web portal or by email.”

Until the on-line instructions for using the portal are revamped for easier use, no obligation to use this filing method should be imposed.

Thank you for this opportunity to comment.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Carolyn L. Larson', written in a cursive style.

Carolyn L. Larson

CLL:car  
Enclosure  
cc: David Pickett, UPRR (by email)

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