

## Whipple, Amanda (UTC)

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**From:** Karl Johnson <kjohnson@g-o.com>  
**Sent:** Monday, September 16, 2013 9:24 AM  
**To:** UTC DL Records Center  
**Cc:** Cindy Kelly; 'Cindy Kelly'  
**Subject:** Docket UW-131386

I have read the information regarding the proposed rule change and it is not clear to me from the material available what is the intent or what will be the effect of the proposed rule change, other than, "WAC 480-110-255(2)(e) and (f), may be read to exempt from Commission regulation certain entities that are not exempt." It would be most helpful if the information provided made it clear what entities under what circumstances are using the rules in what way to make them exempt when UTC staff think they should not be exempt. It has always been my understanding that the purpose of UTC regulation of rates was to prevent utility monopolies from running roughshod over customers who have no recourse regarding rates. Homeowners associations and utility cooperatives, where the members have a vote for their board of directors, have historically not been regulated by UTC because customers do have recourse. If there is no intent to change that stance, then I have no further comment. But I think it would behoove the UTC to make it clear what is the intent of their proposed rule changes, beyond just "WAC 480-110-255(2)(e) and (f), may be read to exempt from Commission regulation certain entities that are not exempt."

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