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February 28, 2019

VIA ELECTRONIC FILING

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P. O. Box 47250
Olympia, WA 98504-7250

Re: Commission Staff Investigation into Reliability Benchmarking and Reliability Reporting
Inquiry, Docket U-190027

Dear Mr. Johnson:

Pursuant to the Commission's January 22, 2019, Request for Written Comments, please find enclosed the Initial Comments of Public Counsel for filing in the above-entitled docket.

Please do not hesitate to contact our office if you have any questions regarding this filing. Thank you.

Sincerely,

Lisa W. Gafken

LISA W. GAFKEN, WSBA No. 31549
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