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December 13, 2021

UE-210804

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SENT VIA E-MAIL

Amanda Maxwell Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

Re: Developing a Commission jurisdictional specific cost-effectiveness test for distributed

energy resources incorporating CETA,

Docket UE-210804

Dear Director Maxwell:

Enclosed for filing in the above-referenced docket are Public Counsel's Initial Comments, with Attachment A, in response to the Commission's Notice of Opportunity to File Written Comments dated November 4, 2021.

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

Sincerely,

NINA M. SUETAKE, WSBA No. 53574

Assistant Attorney General

Public Counsel Unit (206) 389-2055

NMS/CM Enclosures