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September 6, 2022

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
P.O. Box 47250  
Olympia, WA 98504-7250

RE: *Commission Proceeding to Develop a Policy Statement Addressing Alternatives to Traditional Cost of Service Ratemaking (Phase 1 – Performance Metrics)*  
Docket U-210590

Dear Ms. Maxwell:

On June 13, 2022, Staff submitted a letter in this docket informing the Commission that its comments in Docket U-210590 would be similar to the testimony Staff offered on the issue of alternatives to traditional cost of service ratemaking in Dockets UE-220066-67. Staff further stated that, once it had filed such testimony in Dockets UE-220066-67, Staff would file another letter in Docket U-210590 providing cross-references to applicable testimony. Those cross-references are listed below. Staff looks forward to reviewing the proposed metrics submitted by other parties in advance of the response comments that Staff will file on September 26, 2022.

Cross references to applicable testimony regarding performance metrics, from Staff's testimony in Dockets UE-220066-67:

- (1) Ball, Exh. JLB-1T at 39:22-40:8; 41:3-11; 43:5-12; 44:10-47:10; 49:1-50:3.
- (2) Erdahl, Exh. BAE-1T at 19:3-12; 19:16-20:2.
- (3) Snyder, Exh. JES-1T at 15:17-17:21; 18:17-19:4.
- (4) Rector, Exh. ASR-1T at 29:17-33:9; 33:11-35:2; 51:3-52:14; 52:19-22.
- (5) Reynolds, Exh. DJR-1T at 16:13-19:19.

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Sincerely,

*/s/ Daniel J. Teimouri, WSBA No. 47965*  
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DJT/emd