

October 21, 2014

Mr. Steven King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**Re: Docket A-130355, Rulemaking to Consider Possible Corrections and Changes in WAC 480-07, Relating to Procedural Rules**

Dear Mr. King,

Puget Sound Energy Inc. ("PSE") is providing these additional comments on the rulemaking in the above-referenced docket pursuant to the Commission's revised draft rules and Notice of Opportunity to File Written Comments dated September 22, 2014 ("Notice"). PSE filed comments previously in this proceeding on May 17, 2013 and December 20, 2013, and PSE appreciates the opportunity to submit these additional comments. Please note that in making the comments below, PSE does not waive any objections or concerns stated in its prior comments.

**WAC 480-07-140(5)(a)(iii) Insufficient capacity.** PSE requests that the rule identify either the size limitation of the commission's web portal or where such information is maintained.

**WAC 480-07-140(6)(a)(i) Acceptable format.** PSE requests that the rule require all Adobe Acrobat files to be searchable.

**WAC 480-07-140(6)(c) Acceptable organization.** With regard to email size constraints, PSE requests that the commission designate a maximum size for all email correspondence (e.g., 10 MB) instead of referring to the commission's and each sending person's email system, which may vary greatly.

**WAC 480-07-145(2)(a) Submissions exceeding size limitation.** PSE requests that the rule identify either the size limitation of the commission's web portal or where such information is maintained. In **WAC 480-07-145(2)(a)(ii)**, PSE similarly requests that the commission designate a maximum size limitation for email submissions.

**WAC 480-07-150(5)(a) Consent to electronic service.** PSE recommends that the rule state the result if a party neither consents to or declines electronic service in its initial filing. For example, if the initial filing is silent with regard to consent, is the party deemed to decline consent?

Mr. Steven King  
October 21, 2014  
Page 2

**WAC 480-07-150(8)(a) When service is deemed complete.** PSE recommends deleting the reference to electronic return receipts. PSE believes such step is unnecessary given the preceding language, and such additional emails could overburden parties' email systems.

**WAC 480-07-160(2) Confidential information defined.** PSE recommends against deleting the current rule's inclusion of "information protected from inspection or copying under an exemption from disclosure requirements under the Public Records Act, chapter 42.56 RCA." RCW 42.56.230 protects against disclosure of personal information such as customer addresses, phone numbers, social security numbers and other personal identifying information. Such information may not fall under the definition of valuable commercial information but should nonetheless be protected from disclosure for privacy reasons. Removal of this protection, as the commission's revised rule proposes, would arguably require PSE to disclose and make public such personal information.

Thank you for the opportunity to file these comments. If you have any questions regarding these comments, or if we can be of any other assistance, please contact Donna L. Barnett at 425-635-1400.

Sincerely,



Donna L. Barnett