

**From:** [Richard Lauckhart](#)  
**To:** [UTC DL Records Center](#)  
**Subject:** Lauckhart response to Petition to Initiate an Adjudicative Proceeding in U-180680  
**Date:** Tuesday, October 30, 2018 9:44:44 AM

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Dear Records-

Please file this email as comments under PSE IRP Docket No. U-180680.

My name is Richard Lauckhart. I have previously submitted comments in this proceeding.

The Joint Petitioners' Petition to Initiate an Adjudicative Proceeding in U-180680 lays out a compelling case for the need for an Adjudicative Proceeding in U-180680.

That Petition mentions, in part, the need to examine whether new Commitments need to be placed on any WUTC approval of this Ownership Transfer request.

That thinking is consistent with the Comments I have already provided in this proceeding. An Adjudicative Proceeding will allow examination of whether or not the new ownership consortium would agree with the seven additional Conditions I propose, and if not, why not. An examination of those questions will allow for a more comprehensive review of the thinking of the proposed new ownership consortium by the WUTC of this request for approval of the ownership transfer.

Further, it appears that PSE has already opened the door to such an Adjudicative Proceeding by the October 24 comments filed by the Perkins Coie attorneys for PSE that are intended to rebut my comments in this proceeding. It would be appropriate to examine in an Adjudicative Proceeding:

- Who requested that Perkins Coie prepare a rebuttal to my comments (*e.g. PSE executives, or PSE employees, or the proposed new ownership group*), and
- Who reviewed and approved the comments prepared by Perkins Coie before they were filed, and
- The legitimacy of these Perkins Coie rebuttal comments

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Records Management  
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