

October 23, 2014

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State of Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive SW  
PO Box 47250  
Olympia, WA 98504-7250

Re: Rulemaking to Consider Possible Corrections and Changes in  
Rules in WAC 480-07, Relating to Procedural Rules  
Docket A-130355  
Our File No.: UNI45-6

Dear Sir or Madam:

On behalf of Union Pacific Railroad Company, we submit the following comments on the draft revisions to the WUTC's procedural rules, dated September 22, 2014.

We are disappointed to see that the latest draft of the rules continues to require multiple paper copies of pleadings (the current proposal is for an original plus six<sup>1</sup>) in addition to requiring the e-filing of the same documents in both pdf and native formats. This is very onerous on parties practicing before the WUTC and goes beyond what our firm has experienced in any other forum. We recommend that, if e-filing is mandatory, the e-filing of a pdf copy be the only uniform requirement, with requirements for paper copies or documents in native format being exceptions to the rule, mandated only when a specific need for them arises.

If there is a reason why so many copies and formats are needed for most of the WUTC's business, there should, at minimum, be a streamlined procedure for relaxing the rule in instances where it isn't needed. We suggest that the parties to adjudicative proceedings be given discretion to agree with the administrative

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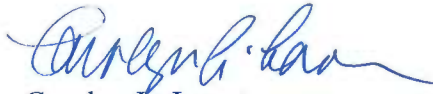
<sup>1</sup> Proposed rule WAC 480-07-145

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law judge on how many copies are needed and in what format. Under the proposed draft rules, it appears the only mechanism for modifying the filing requirement is by seeking an exception a separate, formal proceeding before the WUTC, pursuant to WAC 480-07-110.

Thank you for this opportunity to comment.

Very truly yours,



Carolyn L. Larson

CLL:car

cc: David Pickett, UPRR (by email)

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