**Docket A-130355, Procedural Rules Rulemaking**

**Workshop on WAC 480-07 Part I Proposed Revisions**

**November 19, 2014**

**Issues List**

**WAC 480-07-110 Exemptions from and modifications to commission rules**

* Retain language on granting exemptions in adjudications (CL)
* Clarify language on statutes or rules governing exemption request (PC)
* Require petitioner to file list of prior exemptions (PC)

**WAC 480-07-120 Office hours**

* Delete “legislatively recognized days” (PC)

**WAC 480-07-125 Commission contact information**

* Add bridge line to contact information (Summit)

**WAC 480-07-140 Communicating with the commission**

* Requirement/preference for use of web portal for filings (CL)
* Identify portal and email capacity limits (PSE)
* Reconcile allowing paper filing of informal comments with electronic filing requirements (WRRA, Summit)
* Clarify consequences of paper filing alone (Summit)
* Clarify/define terms such as “locked,” “protected,” and “hard code” (WRRA, Summit, WK)
* Electronic file naming convention (PC, PPL)
* Describe process for multiple web portal submissions (PC)
* Requirement to list documents in cover letter (PPL)
* Need for cover letter with email submission (Summit)
* Rephrase subsection (5) (Summit)
* Clarify process and timeliness when capacity limits preclude full submission (or submission in one transmittal) on date due (Summit)
* Clarify which cross-referenced rules apply in table in subsection (5)(d) (Summit)

**WAC 480-07-141 Commission receipt of a document is not filing or acceptance**

* Rejected document timely when refiled? (CL)
* Identify time for notification of noncompliance with filing requirements (WRRA)
* Clarify filing date (*i.e*., when clock begins to run or stop for statutory or rule deadline calculations) (PC, Summit)
* “Material” v. “substantial” compliance (Summit)

**WAC 480-07-145 Filing documents in adjudicative proceedings**

* Number of hard copies required (Multiple)
* Extend electronic filing time to midnight on due date (WRRA, Summit, WK)
* Permit filing hard copies by mail (Summit)
* Extend to tariff filings or create separate rule (Summit)
* Consistency with work paper filing requirements in WAC 480-07-520 (Summit)
* Require delivery, rather than receipt, of email to comply with deadlines (Summit)
* Applicability to party without email address (Summit)

**WAC 480-07-150 Service of documents in adjudicative proceedings**

* Define results if no express consent to electronic service (PSE)
* Delete reference to electronic return receipts (PSE)
* Require both electronic and paper service with waiver option for both party and UTC service (ICNU)
* Clarify when UTC will serve electronically (Summit)
* No electronic service of complaints, which should be served on registered agent (Summit)

**WAC 480-07-160 Confidential information under RCW 80.04.095 & RCW 81.77.210**

* Retain reference to other kinds of confidential information (PSE, Summit)
* Reconcile number of hard copies of redacted document (CL, PC)
* Encryption of confidential information in electronic documents (PPL)
* Exempt work papers from marking requirements (PPL)
* Establish procedure for designating highly confidential information (ICNU)
* Applicability of section 141 to deficiencies with confidential submission (Summit)
* Clarify effect of deficient confidential submission (Summit)
* Allow time for discussion to respond to request without producing confidential information before 10 day notice given to provider (Summit)

**WAC 480-07-175 Inspection and production of documents in commission investigations**

* Require reasonable notice of review without undue disruption of business or unduly burdensome production of copies (Summit, WK)