

**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 (WRRRA, Summit)
- Clarify consequences of paper filing alone (Summit)
- Clarify/define terms such as “locked,” “protected,” and “hard code” (WRRRA, 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 (WRRRA)

- 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 (WRRRA, 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)