BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Penalty Assessment Against IBFA ACQUISITION COMPANY, LLC, in the Amount of \$100

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DOCKET NO. UT-060977

COMMISSION STAFF'S RESPONSE TO IBFA'S APPLICATION FOR MITIGATION

Pursuant to WAC 480-07-370(1)(c), Commission Staff submits this response to IBFA Acquisition Company's Application for Mitigation.

On July 5, 2006, the Washington Utilities and Transportation Commission (Commission) assessed a penalty of \$100 against IBFA Acquisition Company, LLC (IBFA) for violating WAC 480-120-382. IBFA filed an Application for Mitigation on July 20, 2006. Staff opposes IBFA's Application for Mitigation for the reasons set forth in the attached declaration of Sheri Hoyt.

DATED this 2nd day of August, 2006.

Respectfully submitted,

ROB MCKENNA Attorney General

JENNIFER CAMERON-RULKOWSKI Assistant Attorney General Counsel for Washington Utilities and Transportation Commission