July 16, 2012

David W. Danner, Executive Director and Secretary

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Dr. SW

P.O. Box 47250

Olympia, Washington 98504-7250

RE: In the Matter of Evaluating Electric Utility Conservation Achievements Under The Energy Independence Act, RCW 19.285 and WAC 480-109

 Dockets UE-100170, UE-100176, and UE-100177

Dear Mr. Danner:

Enclosed for filing in the above-referenced docket are the original and 12 copies of the Staff Comments of the Washington Utilities and Transportation Commission and Certificate of Service.

Sincerely,

FRONDA WOODS

Assistant Attorney General

FW:klg

Enclosures

cc: Parties