PERKINSCOLE

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July 17, 2015

Mr. Steven King Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, Washington 98504-7250

RE: Docket A-130355, Rulemaking to Consider Possible Corrections and Changes in WAC 480-07, Relating to Procedural Rules

Dear Mr. King,

Puget Sound Energy Inc. ("PSE") appreciates the opportunity to submit comments on Part III of the rulemaking in the above-referenced docket pursuant to the Commission's draft rules and Notice of Opportunity to File Written Comments dated June 18, 2015. PSE filed comments previously in this proceeding on May 17, 2013, December 20, 2013, and October 23, 2014. Please note that in making the comment below, PSE does not waive any objections or concerns stated in its prior comments.

PSE has no substantive comment on the draft rules but proposes one minor edit to WAC 480-07-370(1)(d)(ii) Pleadings -- General. When permitted. PSE recommends inserting the word "proceeding" as follows: "Any person directly affected by an original petition may file a response. Any party may file a response to a petition filed in an existing adjudicative proceeding except petitions for reconsideration, to which no party may file a response unless the commission requests a response."

PSE supports the Commission's efforts to clarify and update the procedural rules, and PSE has no further comment at this time. Thank you for the opportunity to file comments. If we can be of any further assistance, please contact Donna L. Barnett at 425-635-1400.

Sincerely,

Jonna Br

Donna L. Barnett