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June 29, 2020

SENT VIA WEB PORTAL

Mark L. Johnson Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, Washington 98503

Re: Rulemaking to consider adoption of rules to implement chapter 19.405 RCW and

revisions to chapter 80.28 RCW

Docket UE-191023

Dear Mr. Johnson:

Pursuant to the Commission's June 12, 2020, Notice of Opportunity to File Written Comments, please find Public Counsel's comments enclosed for filing in the above-referenced docket. If there are any questions regarding these comments, please contact Nina Suetake at Nina.Suetake@atg.wa.gov, Stephanie Chase at Stephanie.Chase@atg.wa.gov, or Corey Dahl at Corey.Dahl@atg.wa.gov.

Sincerely,

NINA SUETAKE, WSBA No. 53574

Assistant Attorney General

Public Counsel Unit (206) 389-2055

NMS/KMB Enclosure