

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

SENT VIA UTC WEB PORTAL

April 2, 2018

Mr. Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Generic Cost of Service Docket: U-170002

Dear Mr. King:

This letter is filed in response to Staff's request for comments regarding Staff's proposed topic areas and rulemaking proposal for the electric cost of service generic investigation. The Kroger Co. does not object to Staff's proposed topics or the suitability of these topics for rulemaking or policy statement development, to the extent that it is determined that this evaluation is to take place outside a general rate case. The Kroger Co. takes a particular interest in the evaluation of which methods best allocate cost responsibility for demand, energy and customer-related costs consistent with the principles of cost causation.

The Kroger Co. appreciates Staff's efforts in facilitating this process.

Sincerely,



Kurt J. Boehm, Esq.

BOEHM, KURTZ & LOWRY

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