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State Of WASH.
UTIL. AND TRANSP.
COMMISSION



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

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June 2, 2021

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: *Relating to Electricity Markets and Compliance with the Clean Energy Transformation Act*, Docket UE-210183

Dear Mr. Johnson:

Enclosed please find Public Counsel's Initial Comments in response to the Utilities and Transportation Commission's Notice of Opportunity to File Written Comments on May 3, 2021, regarding the treatment of energy storage for compliance with RCW 19.405.030 through RCW 19.405.050.

If you have questions regarding these Comments, please contact Dr. Hausman at ezra@ezrahausman.com, Sarah Laycock at sarah.laycock@atg.wa.gov, or Lisa W. Gafken at lisa.gafken@atg.wa.gov or (206) 714-3551.

Sincerely,

/s/ *Lisa W. Gafken*
LISA W. GAFKEN, WSBA No. 31549
Assistant Attorney General, Unit Chief
Public Counsel Unit
(206) 464-6595

LWG/KMB
Enclosure