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March 12, 2020

SENT VIA UTC WEB PORTAL

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

Re: In the Matter of Amending, Adopting, and Repealing WAC 480-107, Relating to Purchases of Electricity, Docket UE-190837

Dear Mr. Johnson:

Enclosed for filing in the above-referenced docket are Public Counsel's Initial Comments in response to the Commission's February 6 Notice of Opportunity to File Written Comments. Please do not hesitate to contact me if you have any questions about this filing. Thank you.

Sincerely,

/s/ ===

NINA M. SUETAKE, WSBA No. 53574 Assistant Attorney General Public Counsel Unit (206) 389-2055

NMS/CM Enclosures Received Records Management 03/12/20 14:48 State Of WASH. JTIL. AND TRANSP. COMMISSION