

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to Consider Possible Corrections
and Changes in Rules in WAC 480-07,
Relating to Procedural Rules.

DOCKET A-130355

SIXTH COMMENTS OF PUBLIC COUNSEL

January 12, 2017

I. INTRODUCTION

1. Pursuant to the Commission's Notice of Opportunity to File Written Comments, dated December 7, 2016, Public Counsel submits the following comments regarding the draft procedural rules found in WAC 480-07-300 through -498 (Part III, Subpart A).

II. WAC 480-07-400(1)(C)(III) – DISCOVERY

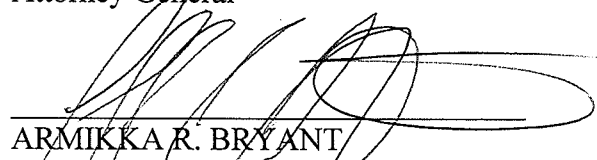
2. WAC 480-07-400(c)(3) defines the term "data request" as it relates to discovery in an adjudicative proceeding under WAC 480-07. The most recent draft of the proposed rules provides clearer, more detailed language around data requests. Public Counsel views this draft language favorably. The proposed language provides specificity into the type of content that is acceptable when requesting a narrative explanation from a party. The proposed language clarifies the permissibility of requesting narrative explanations and what kind of information can be contained in the narrative.

III. CONCLUSION

3. Public Counsel appreciates the opportunity to submit these comments and the continued efforts to modernize the current rules. We look forward to further dialogue with the Commission and stakeholders in this docket and will be in attendance at the rule adoption hearing on January 30, 2017.

Dated this 12th day of January, 2017.

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