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November 4, 2019

VIA ELECTRONIC FILING

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

Re: Rulemaking to consider revisions to WAC 480-109 in order to align existing rules with provisions of ESSSB 5116, Docket UE-190652

Dear Mr. Johnson:

Pursuant to the Commission's October 4, 2019 Notice of Opportunity to File Written Comments, please find enclosed the Initial Comments of Public Counsel for filing in the above-entitled docket.

Sincerely,

/s/ Lisa W. Gafken

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