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March 13, 2020

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P. O. Box 47250
Olympia, WA 98504-7250

RE: *In the Matter of the Petition of Puget Sound Energy for a Declaratory Order Approving the Avoided Cost Rate Methodology for Power Purchases from Schedule 92 Large Qualified Facilities per WAC 480-106-050(5)*
Docket UE-191062

Dear Mr. Johnson:

Enclosed for filing in the above-referenced docket are Commission Staff's Comments regarding Puget Sound Energy's proposed avoided cost rate methodology for power purchases from large qualifying facilities per WAC 480-106-050(5), and Certificate of Service.

Sincerely,

/s/ *Harry Fukano*, WSBA No. 52458
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