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Corp.

May 4, 2006

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, SW
PO Box 4750
Olympia, WA 98504-4750

Re: Docket No. A-050802
Rulemaking to Consider Possible Corrections and Changes in Rules in
Chapter 480-07 WAC, Relating to Procedural Rules

Dear Ms. Washburn:

Thank you for the opportunity to provide comments in the Procedural Rules Rulemaking in the above-cited docket. The majority of the proposed rule revisions are in the nature of "housekeeping" or administrative changes. These rule changes embody in many instances what has become standard practice. The Company supports these proposed revisions with one exception.

One area of the proposed rules, electronic filings, appears at first blush to simply codify existing practices. However, as the rules are designed, this codification goes beyond existing practice and will likely create unintended consequences or burdensome requirements for compliance. Standard practice in the energy industry is to provide to the Record Center and interested parties electronic copies of filings. Generally, these are provided in .pdf format and, for ease of "cutting and pasting" (as in the case of comments in rulemakings), sometimes in Word format. Supporting documentation is also frequently provided in Excel format. Responses to data requests further provide data in a variety of formats. The Company understands that this has worked well for the filing companies, the Commission Staff, and other parties.

The proposed rule would unnecessarily complicate this. The proposed revisions to WAC 480-07-140(6)(b) would require the filing of electronic versions of documents "in .pdf (Adobe Acrobat) format, supplemented by a separate file in .doc (MS Word), .wpd (WordPerfect), .xls (Excel), or .ppt (Power Point) format, so that spreadsheets displaying results of calculations based on formulas include all formulas, and do not include locked, password protected or hidden cells."

This is problematic for several reasons. In some instances, the original electronic file (other than in .pdf format) may be data provided by a third party and not available to the Company. Some data (e.g., in Excel format) is embedded into Word documents. Because of this mixing of electronic formats, it would be burdensome to provide and cumbersome for the reader to piece together the original electronic file. Further some applications such as Excel are very "powerful." Included in these spreadsheets are a host of other calculations that can be both proprietary and highly-linked to a series of other calculations. These other calculations may be in a lengthy series of several spreadsheets, yet may have no material effect on the processing of a company's filing. Perhaps a better alternative would be to explore ways to codify the existing practice of providing .pdf documents supplemented with source data where it has worked well. This may be best addressed in a technical workshop devoted to this issue. It is important that this proposed rule revision be clarified to avoid what may be unintended consequences.

Thank you for the opportunity to provide comments in this rulemaking. Please call me at (509) 495-8706 regarding any follow-up on this matter.

Sincerely,

Bruce Folsom, by Patty Hansen

Bruce Folsom
Manager, Regulatory Compliance