

Simon J. ffitc
Attorney at Law
Telephone: (206) 669-8197
Email: simon@ffitchlaw.com

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SENT VIA UTC WEB PORTAL

Mark Johnson
Executive Director and Secretary
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: Rulemaking To Address Electric and Natural Gas Cost of Service
Dockets UE-170002/UG-170003

These comments are filed on behalf of The Energy Project in response to the Commission's Notice of Opportunity To File Written Comments (July 23, 2018) , and the CR 101 Notice in the above-captioned dockets.

The Energy Project supports the goals of the Commission in pursuing this rulemaking. Developing accurate, transparent, and effective methods and processes for the filing of cost-of-service studies will provide significant benefits for stakeholders and the Commission itself. Standardization of presentations and information will improve consistency and facilitate ease of comparison between competing studies. The same is true for any guidance on core principles and methods that can be developed in the dockets. Overall, the issues listed for consideration in the CR 101 should reduce the administrative burdens and litigation costs for parties in general rate cases and other proceedings. This an important factor for smaller parties with limited resources for expert witnesses.

The Energy Project has not retained an expert witness in these dockets due to resource constraints, and therefore will not address the specific technical questions in the Notice at this time. TEP will review filings by other parties, continue to participate in the docket, and will comment on specific issues affecting low-income customers as the issues are further developed.

Sincerely,

/s/ Simon J. ffitc, WSBA No. 25977
Simon J. ffitc
Attorney at Law
for The Energy Project

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321 High School Rd. NE, Suite D3, Box No. 383, Bainbridge Island, WA 98110