



Bob Ferguson
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August 31, 2018

SENT VIA UTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
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 and UG-170003

Dear Mr. Johnson:

On August 13, 2018, Public Counsel notified the Commission that we would be unable to file comments by the comment deadline, August 31, 2018, due to the significant workload commitments and time constraints of our expert, Glenn Watkins, and the timeframe allotted for this comment period. Although the Commission declined to extend the deadline as requested by Public Counsel,¹ the Commission encouraged Public Counsel to submit comments as soon as possible after the August 31st deadline, if necessary.²

Accordingly, Public Counsel submits this letter to update the Commission of our progress. We are diligently working with our expert to address the questions raised in the Notice of Opportunity to Submit Comments. However, we are regrettably unable to complete the comments by the August 31st deadline. Public Counsel understands the importance of this rulemaking and its potential impacts on ratepayers and seeks to provide thorough and comprehensive comments to the Commission. Rather than provide incomplete comments followed by supplemental comments, we are working as quickly as possible to finalize our response to the first substantive questions in this rulemaking. We believe that a comprehensive response would be more useful to the Commission and stakeholders. We appreciate the

¹ Notice Declining to Extend Comment Deadline at 1.

² *Id.*

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opportunity to submit our comments after the deadline, and intend to file them as soon as possible next week.

If you have any questions about this letter, please contact the undersigned at Lisa.Gafken@atg.wa.gov or (206) 464-6595.

Sincerely,

/s/ Lisa W. Gafken

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LWG/CM