



Bob Ferguson  
**ATTORNEY GENERAL OF WASHINGTON**

800 Fifth Avenue #2000 • Seattle WA 98104-3188

November 2, 2016

**VIA UTC WEB PORTAL ONLY**

Mr. Steven V. King  
Executive Director  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
P. O. Box 47250  
Olympia, WA 98504-7250

RE: *Rulemaking for Integrated Resource Planning, WAC 480-100-238, WAC 480-90-238,  
and WAC 480-017, Docket U-161024*

Dear Mr. King:

Enclosed please find the initial comments of Public Counsel in this proceeding. These comments were drafted with assistance from Ms. Lea Fisher of Fisher Regulatory Consulting. For any questions regarding these comments please contact Mary Kimball at (206) 389-2529.

Thank you.

Sincerely,

Lisa W. Gafken  
Assistant Attorney General  
Public Counsel Unit Chief  
(206) 464-6595

LWG:cm  
Enclosures

