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April 24, 2020

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P. O. Box 47250
Olympia, WA 98405-7250

RE: *Puget Sound Energy's Petition 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,

Commission Staff (Staff) has reviewed Puget Sound Energy's April 6, 2020 responses to Staff's comments on the company's proposed avoided cost rate methodology for large qualifying facilities. After considering the company's proposed methodology, examining the responses to Staff's comments, and engaging in additional discussion with the company, Staff has no further comments and recommends that the Commission issue an order approving the proposed methodology. Staff appreciates the company's cooperation and communication during this process.

Respectfully,

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