## JOEL C. MERKEL

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September 23, 2013

Dave Danner, Executive Secretary Washington Utilities and Transportation Commission Attn: Records Center PO Box 47250 Olympia WA 98504-7250

Re: Comments on Docket No. 131386 regarding proposed amendments to WAC 480-110-255

Dear Mr. Danner:

Thank you for providing an opportunity for Peninsula Light Company, Parkland Light & Water Company, Modern Electric Company and Fruitland Mutual Water Company ("Joint Parties"), to provide comments on WUTC's "Preproposal Statement of Inquiry Petition, Docket No. 131386, to Consider the Need to Evaluate and Clarify Jurisdiction of Water Companies, WAC 480-110-255, related rules participate in the Electronic Tariff filing program."

I am authorized to submit this e-filing on behalf of the Joint Parties. My contact information is set forth below:

Name: Joel C. Merkel Telephone: 206-389-8222

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Sincerely,

MERKEL LAW OFFICE

Joel C. Merkel

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Seattle	