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November 12, 2020

SENT VIA WEB PORTAL

Mark L. Johnson Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, Washington 98503

Re: Rulemaking to consider adoption of rules to implement chapter 19.405 RCW and revisions to chapter 80.28 RCW; In the Matter of Amending, Adopting, and Repealing WAC 480-100-238, Relating to Integrated Resource Planning Dockets UE-191023 & UE-190698 (Consolidated)

Dear Mr. Johnson:

Pursuant to the Commission's October 14, 2020, Notice of Opportunity to File Written Comments, please find Public Counsel's comments enclosed for filing in the above-referenced docket. If there are any questions regarding these comments, please contact Nina Suetake at Nina.Suetake@atg.wa.gov, Stephanie Chase at Stephanie.Chase@atg.wa.gov, or Corey Dahl at Corey.Dahl@atg.wa.gov.

Sincerely,

NINA SUETAKE, WSBA No. 53574

Assistant Attorney General

Public Counsel Unit (206) 389-2055

NMS/KMB Enclosure