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## *Via Electronic Filing*

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

Re: Rulemaking to Consider Possible Corrections and Changes in Rules in  
WAC 480-07, Relating to Procedural Rules: Second Draft Proposed Rules  
for Part III B of WAC 480-07  
**Docket A-130355**

Dear Mr. King:

By and through this letter, the Industrial Customers of Northwest Utilities (“ICNU”) responds to the Notice of Opportunity to Submit Written Comments issued by the Commission in the above-referenced docket on October 16, 2017.

ICNU has participated in all relevant stages of this docket, given the importance of the subject matter, and appreciates the opportunity to provide comments on the draft rules being considered by the Commission here.

ICNU’s earlier comments on the proposed Part III B procedural rules pertaining to what is commonly referenced as “general rate cases” covered a number of subject areas, including the timing and frequency of general rate cases, the relevance and timeliness of responsive pleadings, and the quality and timing of other materials to be filed with the Commission or provided to other parties during general rate case proceedings.<sup>1/</sup> ICNU appreciates the Commission’s attention to its comments and concerns, and believes that many of these same concerns are reflected in the draft procedural rules now subject to comment.

While ICNU’s earlier comments argued for what it perceived to be more customer-friendly changes to the rules, we remain cautiously optimistic that the current draft

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<sup>1/</sup> ICNU incorporates by reference its previous comments submitted in this docket.

language will be reasonably applied to mitigate the considerable leverage wielded by regulated companies to control the timing of general rate cases and the information provided to the

Commission and its Staff, Public Counsel, and Intervenors. In the end, the quality of the information provided the Commission by all parties is reflected in its orders and other materials constituting the Commission's work product.

Again, ICNU thanks the Commission for the opportunity to respond and provide these comments.

Sincerely,

/s/ Patrick J. Oshie

Patrick J. Oshie, WSB #17796

Of Counsel

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