

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to Consider Possible Corrections  
and Changes in Rules in WAC 480-07,  
Relating to Procedural Rules.

DOCKET A-130355

**SEVENTH COMMENTS OF PUBLIC COUNSEL**

**December 1, 2017**

**I. INTRODUCTION**

1. Pursuant to the Commission's Notice of Opportunity to File Written Comments, dated October 16, 2017, Public Counsel submits the following comments regarding the draft procedural rules for WAC 480-07 and looks forward to participating in the workshop scheduled for December 20, 2017.

**II. WAC 480-07-500(4) – FAILURE TO COMPLY**

2. The proposed rule does not clarify when a resubmission of a defective filing restarts the statutory clock.

**III. WAC 480-07-505(1) – GENERAL RATE PROCEEDINGS**

3. Public Counsel recommends language clarifying that a proposed multiyear rate plan will initiate a general rate proceeding if the aggregate increase alters gross annual revenue by three percent or more over the course of the plan.

**IV. WAC 480-07-510(3) – WORK PAPERS AND ACCOUNTING ADJUSTMENTS**

4. With multiple technical experts filing who may have significant work papers, it would be very challenging to also file work papers immediately after testimony is filed. Trying to finalize both testimony (often with multiple exhibits) and work papers on the same day would be very challenging for support staff (not to mention the lawyers and analysts trying to organize, proof read, etc.).

**V. CONCLUSION**

5. Public Counsel appreciates the opportunity to submit these comments and the continued efforts to modernize the current rules. We look forward to further dialogue with the Commission and stakeholders in this docket and will attend the Workshop on December 20, 2017.

Dated this 1<sup>st</sup> day of December 2017.

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