

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: May 9, 2017
DOCKET: UE-161204
REQUESTER: Pacific Power

WITNESS: David Panco
RESPONDER: David Panco
TELEPHONE: (360) 664-1313

1. Please identify, by docket and order number, each instance in which the Commission has referred to the regulatory compact as a “metaphor”.

Response:

Staff used the word “metaphor” as it is ordinarily used, meaning as “a figure of speech in which a term or phrase is applied to something to which it is not literally applicable in order to suggest a resemblance”.¹ Staff’s point is that state statutes, not the notion of a regulatory compact, provide the authority for Commission regulation of public service companies. The regulatory compact metaphor does not fully or accurately describe Washington law.

Please see the attached article by Scott Hempling, which informed the development of Staff’s testimony.

¹ THE RANDOM HOUSE DICTIONARY OF THE ENGLISH LANGUAGE at 1207 (2d. ed. 1987).