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AND TRANSF

VIA ELECTRONIC FILING

September 7, 2018

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P. O. Box 47250
Olympia, WA 98504-7250

Re: Rulemaking to modify existing consumer protection and meter rules to include Advanced Metering Infrastructure, Docket U-180525

Dear Mr. Johnson:

Pursuant to the Commission's July 10, 2018, Notice of Opportunity to File Written Comments, please find enclosed the Initial Comments of Public Counsel for filing in the above-entitled docket.

Sincerely,

NINA M. SUETAKE Assistant Attorney General WSBA No. 53574

Public Counsel Unit (206) 389-2055

NMS/LC