

1 analysis. Most instances of Staff's silence or limited responses to the Company  
2 simply reflected an ongoing analysis or confusion in sorting through the data. It is  
3 extremely difficult for Staff to initiate or respond to communications when it has not  
4 developed a basic understanding of the materials and data involved in the general  
5 rate filing.

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7 **Q. Has Staff generally been responsive to WCI over the course of dockets TG-**  
8 **131794 and TG-140560?**

9 A. Staff acknowledges limited or absent responses at times over the course of the past  
10 10 months, but believes it has largely been responsive and helpful to the Company  
11 throughout its two filings. Staff notes that the parties have voluntarily engaged in  
12 hundreds of conversations dating back to WCI's initial filing in September 2013.

13 As WCI previously pointed out and Staff acknowledges, Staff was largely  
14 non-responsive during the last few weeks in May 2014. At that time, Staff was  
15 conducting its analysis of the extensive records in TG-131794 and TG-140560.  
16 Moreover, Staff's then-counsel suddenly could not continue representation due to  
17 unforeseen circumstances.

18 The complexity of this filing coupled with the absence of counsel in a formal  
19 proceeding resulted in Staff's inability to respond to the Company during that period.  
20 Staff acknowledges the lack of communication in May likely exacerbated disputes  
21 between the parties, but maintains that it has undertaken a genuine effort to answer  
22 appropriate questions and cooperate with the Company for the majority of WCI's  
23 two filings dating back to September 2013.