



**Bob Ferguson**  
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June 14, 2021

**SENT VIA WEB PORTAL**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

Re: *Relating to Electricity Markets and Compliance with the Clean Energy Transformation Act*, Docket UE-210183

Dear Mr. Johnson:

Enclosed please find Public Counsel's Comments in response to the Utilities and Transportation Commission's Notice of Opportunity to File Written Comments on May 17, 2021, regarding the prohibition on double counting in RCW 19.405.040(1)(b).

If you have questions regarding these Comments, please contact Dr. Hausman at [ezra@ezrahausman.com](mailto:ezra@ezrahausman.com), Sarah Laycock at [sarah.laycock@atg.wa.gov](mailto:sarah.laycock@atg.wa.gov), or Lisa W. Gafken at [lisa.gafken@atg.wa.gov](mailto:lisa.gafken@atg.wa.gov) or (206) 714-3551.

Sincerely,

*Lisa W. Gafken*  
/s/  
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Enclosure

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