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July 11, 2018

Via Web Portal

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

**Re: Docket No.: A-130355
Rulemaking to Consider Possible Corrections and Changes in
Rules in WAC 480-07, Relating to Procedural Rules**

Dear Mr. Johnson:

CenturyLink is writing in response to the Commission's request for comments in this docket, concerning revisions to WAC 480-07-160 and WAC 480-120-420. CenturyLink appreciates the opportunity to comment, and further appreciates the extent to which our previous comments, and those of other parties, are reflected in recent revisions.

While CenturyLink no longer files rate cases, and has a relatively smaller number of confidential filings than some other utilities, we echo the concerns raised about some of the sections that have not yet been addressed in the revisions to the rule. In particular, we concur with PSE that the manner of marking various categories of information is administratively burdensome, and unnecessary (WAC 480-07-160(2)). We also concur in PSE's related comments re "Marking," and in the other related changes to the rule on protective orders, WAC 480-120-420.

The administrative burden is significant in terms of required staff training, and the time it takes to accomplish these various markings. Some documents that were not prepared by the filing party may not even accommodate all of the additional verbiage. And the additional time it takes to accomplish the marking is particularly troublesome on tight-turnaround or voluminous filings. CenturyLink is unaware of failings or weaknesses in the current rules and methods, and the changes thus seem to add burden without benefit.

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Please don't hesitate to contact me if you have any questions.

Sincerely,

/s/ Lisa A. Anderl

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