



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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May 28, 2021

Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop S.E.  
Lacey, Washington 98503  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: Inquiry into Reducing the Administrative Burden in Support of the Commissions  
Ongoing Inquiry into the Adequacy of the Current Regulatory Framework,  
**Dockets U-210151**

Dear Mr. Johnson:

On April 27, 2021, the Washington Utilities and Transportation Commission (Commission) issued a notice of opportunity to provide comments on the administrative burden created by reviewing the recurring filings utilities must file with the Commission due to statute, rule, or order.

Commission Staff (Staff), specifically the Conservation and Energy Planning and Energy Regulation sections of the Regulatory Services Division, appreciates the opportunity to comment. Staff based its comments on the relationship between the level of work and the level of benefit derived from reviewing the filings. Staff reserves the right to change these recommendations based on other information.

These comments are relevant only to reports filed by electric and gas companies and do not address reports filed in other industries.

These comments do not propose or address potential solutions or the process necessary to change a reporting requirement. The legislature mandated some of the reports in statute, meaning that

any change to those reporting requirements would require legislative change. The Commission requires some of the reports by rule meaning that any change to those reporting requirements would require amendments to the rule, although the Commission could potentially waive the reporting requirement under WAC 480-07-110. These statutory and rule requirements are not fully reflected in the attached spreadsheet.

Staff looks forward to working with utilities, stakeholders, and other members of the Commission to develop final recommendations. Staff is eager to address how the administrative burden of regulatory processes can be reduced.

Sincerely,

Jason L. Ball

Assistant Director, Energy Regulation