

Graciela Etchart
07/23/99
Info Request on Operations Rules

UE-990413

02:42:23 PM



"Popoff, Phillip" <PPopof@puget.com> on 07/23/99 01:55:46 PM

To: Graciela Etchart/WUTC@WUTC, Jim Russell/WUTC@WUTC
cc: Dennis Moss/WUTC@WUTC, Marjorie Schaer/WUTC@WUTC, Doug Kilpatrick/WUTC@WUTC,
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Subject: Info Request on Operations Rules

Good afternoon,

Thank you for the initial draft rules. Obviously quite a bit of work went into writing all those rules up. Please note the purpose of this email is not to provide feedback on those rules, but to request additional information.

There is some additional information that might help to increase our collective productivity. Jim Russell made a good suggestion on the phone yesterday. He thought it would be most productive if I email these to all of you on the cc list, so we all stay on the same page.

Information Requested

It would be most helpful if the WUTC Staff could provide a brief paragraph/statement or two on each of the proposed rule revisions in the list below that identifies or explains the following:

* Please identify exactly what the language revision of each proposed rule is intended to change. If some revisions were intended only to clarify, identify those changes, too. It appears some draft rules contain multiple changes and multiple clarifications. Providing us with these statements will help us understand what the WUTC Staff is trying to accomplish, minimizing our confusion, and avoiding unnecessary contention.

* In each draft rule where changes from the current rules are intended (including new rules) please provide an explanation of why the WUTC Staff is proposing the change. This will help in two ways. First, by understanding the WUTC Staff's interest behind proposing each change we will understand why the change was proposed. Second, if any party has some reservations about the specific position proposed in the draft rules, we may be able to identify alternative solutions that meet all our interests.

List of Rules for which Information is Requested

Consumer Rules:

* All draft rules in this section from 480-90/100-041 through 480-100-XX8.

Metering Rules:

- * WAC 480-90/100-141/131 Identification of Meters.
- * WAC 480-90-136 Meter set assembly location.
- * WAC 480-100-136/141/146 Accuracy requirements for electric meters.
- * WAC 480-90/100-161/171 Complaint meter test.

Closing

We realize it may take some time to write down the information requested

RMW/FAB

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above. However, this information would probably increase the productivity of the entire group and lead to better results for all parties, even if it pushed the WUTC Staff's target deadline for submitting proposed rules out a couple of weeks. We look forward to working with all of you to accomplish the objectives set out for us by the Governor's Executive Order. If there is anything I can do to help, please contact me by email or phone at (425) 462-3229.

Thanks,
Phillip Popoff