

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSES TO DATA REQUESTS

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| DATE PREPARED: June 18, 2024 | WITNESS: Benjamin Sharbono |
| DOCKET: TG-230778 | RESPONDER: Benjamin Sharbono |
| REQUESTER: Murrey's | TELEPHONE: 360-664-1242 |

DATA REQUEST NO. 13:

At BC-1T, 12, Staff concludes that the Company has acted as “its own insurer” in violation of statute and rules seemingly for not filing a Form G. If that is true, by this rationale, would any company with a current Form E on file with the Commission which includes a deductible of any amount be in similar violation of Commission law unless it also files a Form G to support any such deductible? Please also provide any support for this interpretation of Commission rules.

RESPONSE:

This data request misrepresents Staff’s testimony. Staff testified that the company identified itself as self-insuring in its workbooks, documents, and in discussions with staff, and it is on that basis that Staff describes the company as acting as its own insurer. Please see RCW 81.77.060 and WAC 480-70-181.

It is not staff’s opinion that it would be a violation for a “deductible of any amount.” Staff’s position is based on the company’s statements, actions, and decisions related to the deductible, and the amount of the deductible allowing the company to act as a self-insured entity.