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| Román D. Hernándezroman.hernandez@klgates.comT +1 503 226 5776 |

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| October 7, 2015 |

**Via Email and Fed Ex Overnight Mail**

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| Executive Director and SecretaryWashington Utilities & Transportation Commission P.O. Box 472501300 S. Evergreen Park Drive S.W. Olympia, WA 98504-7250 |

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| Re: |  *Frontier Communications Northwest Inc. against Puget Sound Energy, Inc.* *Docket UE-151344* |

Dear Executive Director and Secretary,

Attached to our email please find Frontier’s Response to Cross-Motion for Summary Determination in both PDF and Word format in the above-referenced matter. The original and one copy will follow via Fed Ex Overnight delivery.

Best regards,

/s/ Román D. Hernández

Román D. Hernández

Enclosure

cc: Presiding Administrative Law Judge, Gregory J. Kopta

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|  Jennifer Cameron-Rulkowski, Krista Gross, Betsy DeMarco |
|  James F. Williams, Karen B. Bloom |