

November 14, 2018

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Donna L. Barnett
DBarnett@perkinscoie.com
D. +1.425.635.1419
F. +1.425.635.2419

Received
Records Management
11/14/18 14:01
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket A-130355, Rulemaking to Consider Possible Corrections and Changes in WAC 480-07, Relating to Procedure Rules

Dear Mr. Johnson:

This comment letter is submitted on behalf of Puget Sound Energy (“PSE”) in response to the Commission’s Notice of Opportunity to Submit Written Comments dated October 17, 2018 regarding proposed amendments to the Commission’s standard protective order. PSE has only one comment on the proposed amendments, set forth below.

PSE recommends deleting the second sentence of Section A, General Provision: “**The Commission expects Confidential Information to include only numbers, customer names, and planning details.**” After a great deal of time and effort, the Commission amended the definition of Confidential Information in WAC 480-07-160 to distinguish it from information exempt from the disclosure requirements of the Public Records Act. The sentence referenced above conflicts with the newly adopted definition of Confidential Information. For example, customer names, which would likely fall under the former definition of Confidential Information, would not likely meet the current definition of Confidential Information. Further, establishing a Commission expectation of Confidential Information that differs in any way from the codified definition of Confidential Information invites potentially conflicting standards. PSE believes the Commission established its expectations through its adoption of the definition itself, and any additional description is unnecessary and potentially confusing. Thank you for the opportunity to file comments on behalf of PSE. If I can be of any further assistance, please contact me at 425-635-1419.

Sincerely,



Donna L. Barnett