



Bob Ferguson  
**ATTORNEY GENERAL OF WASHINGTON**

800 Fifth Avenue #2000 • Seattle WA 98104-3188

November 14, 2018

**SENT VIA UTC WEB PORTAL**

Mr. Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
P. O. Box 47250  
Olympia, WA 98504-7250

Re: Rulemaking to Make Corrections and Changes in Rules in WAC 480-07, Relating to  
Procedural Rules,  
Docket A-130355

Dear Mr. Johnson:

Pursuant to the Commission's October 17, 2018, Notice of Opportunity to File Written  
Comments, please find enclosed the Twelfth Comments of Public Counsel for filing in the  
above-entitled docket.

Sincerely,

NINA SUETAKE  
WSBA No. 53374  
Assistant Attorney General  
Public Counsel Unit  
(206) 389-2055

NS/lec

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