



Bob Ferguson

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February 28, 2020

SENT VIA WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: *Rulemaking to consider adoption of rules to implement chapter 19.405 RCW and revisions to chapter 80.28 RCW*
Docket UE-191023

Dear Mr. Johnson:

Pursuant to the Commission's January 15, 2020, Notice of Opportunity to File Written Comments, please find Initial Comments enclosed for filing on behalf of Public Counsel in the above-referenced docket. If there are any questions regarding these comments, please contact Corey Dahl at Corey.Dahl@atg.wa.gov or (206) 464-6380.

Sincerely,

/s/ Nina Suetake

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NMS/KMB
Enclosure