

**Summary of Written Comments on Proposed Rules for Adoption
Procedural Rules Rulemaking – A-072162
August 12, 2008**

ISSUE	INTERESTED PERSON	COMMENTS	RESPONSE
WAC 480-07-510 – Rate case filings and work papers			
Organization of rule	Public Counsel	In its Fourth set of Comments concerning the CR-102 proposed rules, Public Counsel supports the reorganization of the rule into nine distinct subsections and supports the amendment.	
Password Protected work papers	Public Counsel	In its Fourth set of Comments concerning the CR-102 proposed rules, Public Counsel supports the language addressing the use of password protected , locked or hidden cells included in subsection (3)(c) of the proposed rule.	
WAC 480-07-904 - Delegation			
Delegation of telecom company transfers of property	Public Counsel	In its Fourth set of Comments, addressing the CR-102 proposed rules, Public Counsel notes that the language imposing limitations on applications for transfers of property under subsection (1)(l) excludes <i>de minimis</i> items. Public Counsel opposes this change and requests the Commission limit delegation to applications to approve transfers of property that have a market value of less than \$200,000 or one percent of the company’s rate base.	

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	Verizon	<p>In comments on the CR-102 proposed rules, Verizon notes that the CR-102 proposed rules include a monetary limit for transfers of property delegated to the Executive Secretary. Verizon objects to including monetary limits as unnecessary and restrictive, asserting that the specific facts of each proposed transfer of property would determine whether the proposal was addressed at an open meeting or as a delegated item.</p> <p>Verizon notes that if the Commission chooses to to include monetary limitations for delegations of transfers of property, the wording should be changed to reflect that smaller, not larger, transactions are delegated to the Executive Secretary.</p> <p>Verizon also notes that prior drafts of this rule delegated a determination under WAC 480-143-180 that property is not necessary or useful. Verizon requests the Commission include “necessary or useful” determinations as a delegated item under this rule, as allowing the Executive Secretary to make such determinations will more efficiency and flexibility in determining whether a transfer of property is “necessary or useful to the company’s regulated business.</p>	