



Christine O. Gregoire
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July 28, 2004

VIA FAX ONLY:

Carole Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

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OFFICE OF THE ATTORNEY GENERAL

Re: Financial Reporting Rules
A-021178 and TO-03288
July 28, 2004, 1:30 p.m. Open Meeting Item

Dear Ms. Washburn:

This letter is to advise that Public Counsel is unable to attend the open meeting on the above-captioned matter. However, for the reasons expressed in our multiple comments filed in the proceeding, we are strongly supportive of the rules being proposed. We concur with the statement in the open meeting memorandum that there is a need for new rules that will "provide the Commission with more timely identification and disclosure of financial transactions that pose difficult regulatory issues." While not all our recommendations were incorporated by Staff, the Commission Staff has conducted a careful and thoughtful process and done a good job of balancing competing interests and incorporating stakeholder concerns where appropriate. Public Counsel, therefore, supports the Staff recommendation that a CR 102 Notice of Proposed Rulemaking be filed with respect to these rules.

Sincerely,

Simon J. Fitch
Assistant Attorney General
Public Counsel Section
(206) 389-2055

SJf:cjw

cc: Fred Ottavelli (WUTC Staff - VIA email)
Sharyn Bate (WUTC Staff - via email)

