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Amanda Maxwell Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE P.O. Box 47250 Olympia, WA 98504-7250

RE: Commission Proceeding to Develop a Policy Statement Addressing Alternatives to Traditional Cost of Service Ratemaking (Phase 1 – Performance Metrics) Docket U-210590

Dear Ms. Maxwell:

Staff's comments in the above-referenced docket will be similar to the testimony Staff intends to offer on the issue of alternatives to traditional cost of service ratemaking in Dockets UE-220066-67. Staff's deadline to file that testimony is July 19, 2022. Once Staff has filed this testimony in Dockets UE-220066-67, Staff will file another letter in this docket providing cross references to applicable testimony.

Sincerely,

/s/ Daniel J. Teimouri, WSBA No. 47965
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DJT/emd