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September 21, 2018

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SENT VIA WEB PORTAL

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

Re: *Rulemaking to Implement Rules Regarding the Utilities and Transportation Commission's Jurisdiction and Regulation of Community Solar Companies, Final Comments of Public Counsel, Docket UE-171033*

Dear Mr. Johnson:

Pursuant to the Commission's Notice of Opportunity to File Written Comments on Proposed Rules issued on August 22, 2018, Public Counsel respectfully submits the following comments on the proposed rules regarding community solar companies operating in Washington State. Public Counsel does not have any new comments regarding the proposed draft rules. However, we continue to support our previous recommendations and comments, which were filed on:

- November 20, 2017
- March 1, 2018,
- March 21, 2018
- July 26, 2018

Public Counsel firmly believes that the Commission should include our recommendations listed in our previous comments, as they provide necessary consumer protections for consumers participating in community solar projects administered by third parties. For example, we believe an unambiguous disclosure of the type of services that the participant will be subscribing or

To: Mark L. Johnson
Re: Docket UE-171033, Final Comments of Public Counsel
Date: September 21, 2018
Page 2 of 2

leasing should be included in the proposed rules, in order to reduce customer confusion. Additionally, we believe the Commission should maintain and post a list of all community solar projects, programs, and services on its website to further reduce customer confusion.

Public Counsel appreciates the opportunity to comment on the proposed Rules. We look forward to attending the Rule Adoption Hearing on September 26, 2018 and will be present to take any questions.

Sincerely,

Carla Colamonicí

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