

May 18, 2007

**VIA ELECTRONIC MAIL & ABC LMI**

Ms. Carole Washburn  
Executive Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
PO Box 47250  
Olympia, WA 98504-7250

Re: Rulemaking to Implement Initiative Measure No. 937, Second Comment Opportunity  
(CR 101), Docket No. UE-061895

Dear Ms. Washburn:

Enclosed please find the original Second Comments of Public Counsel (CR-101) for filing in the above-entitled docket.

Sincerely,

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

SJf:cjw  
Enclosures

cc: Service List (E-Mail and US Mail)