

Cierra Holland

Thank you for the opportunity to provide feedback on the implementation of WAC 173-446-230(2)(h). Below are Seattle City Light's preliminary responses to the requested questions based on our review and internal discussions:

1. Can administrative costs of the program be demonstrated from audited financial statements from utilities?

o Yes, administrative labor costs can be captured using timesheets. However, these specific costs are not detailed at a granular level in the utility's official financial statements. While we do undergo an annual financial audit, administrative expenses are likely captured broadly within the audited financials rather than itemized in detail.

2. What documentation do utilities have, consistent with the program rule, that indicate administrative program costs?

o Timesheet codes specific to administrative tasks can be utilized to run financial reports. These reports can provide a detailed breakdown of labor costs and other associated administrative expenses for program reporting purposes.

3. How should utilities submit requests for recovery of administrative costs? What supporting documentation should be submitted?

o We recommend submitting cost recovery requests either annually or semi-annually. Supporting documentation could include a financial/timekeeping report generated from timesheet data. If permissible, overhead costs associated with administrative staff during working hours should also be considered for recovery, although further clarification may be needed on this point.

4. How can Ecology promote consistent and predictable treatment across utilities in implementing WAC 173-446-230(2)(h)?

o To ensure consistency and predictability, Ecology could establish a standardized cost recovery process. Clear guidance on eligible costs, including examples, would be beneficial. Additionally, defining allowable overhead costs explicitly would help utilities align their submissions with program expectations.

Thank you,
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