SBUA Comment for AR 641 Division 860-001 Rule Updates: Informal Phase

Small Business Utility Advocates ("SBUA") appreciates the opportunity to participate in this Rulemaking process and offers these comments on the rules subject of the forthcoming March 12, 2021 workshop.

Confidential Information 860-001-0070: No comment.

Discovery in Contested Case Proceedings 860-001-0500: Time requirements for responses to discovery requests should be included within the rule for easier reference, or alternatively the rule may explicitly reference the rule governing timing.

Data Requests 860-001-0540: Huddle or similar mechanism seems to work as an alternative that is both accessible and provides confidentiality required.

General Rate Revision 860-022-0019: No comment.

Filing Requirements in Contested Case and Declaratory Ruling Proceedings 860-001-0170: SBUA finds use of Huddle or similar technology is comparable and reasonable electronic solution to sharing confidential information. SBUA also appreciates this discussion to achieve a contemporary rule that is in step with best technology and equitable practices.

Respectfully submitted March 9, 2021

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