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November 17, 2014

Joselyn Luedtke
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Nebraska Public Service Commission
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RE: Rules and Regulations No. 192, Title 291, Chapter 1,
Rules of Commission Procedure-Comments

Dear Joselyn:

In response to the solicitation for comments issued September 30, 2014, I am submitting the following comments regarding the proposed amendments to the Rules of Commission Procedure:

- In proposed Section 004.10 - Conducting a Contested Case Hearing, I am concerned that the provisions relating to presentation of evidence are limited strictly to a petitioner and a respondent. As Public Advocate, my participation in proceedings before the Commission is usually on the basis of intervention. I would ask that some provision be made to clearly show that an intervener has the right to present evidence, and in what order. The current rule (291, Chapter 1, 18.08) avoids this question by not naming the parties from whom testimony is being received. Please consider some clarification to insure full participation by interveners.
- In proposed Section 004.12 regarding the official record, I see that all references are to the "agency" and wonder if that should refer instead to the "Commission".

Sincerely,

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