

MODIFICATION REQUEST COVER SHEET

Name of Filer	Dave Fenn
Reporting Period	<input type="checkbox"/> Annual/Appointment reports: <input checked="" type="checkbox"/> (Amended on June 7, 2024) Candidate report (Covering May 6, 2023 through May 5, 2024)
Type of Request	<input checked="" type="checkbox"/> New <input type="checkbox"/> Renewal with No Change <input type="checkbox"/> Full Commission Approval <input type="checkbox"/> Renewal with Change
Office Held/Sought & Term	Public Utility Commissioner, Lewis Co. PUD 01 Election Year 2024
Application Rule(s)	<input checked="" type="checkbox"/> Income & Ownership Interest: WAC 390-28-100(1)(b) <input type="checkbox"/> Personal Residence: WAC 390-28-100(1)(d) <input type="checkbox"/> Attorney: WAC 390-28-100(1)(e)(i) <input type="checkbox"/> Judge / Judicial Candidate: WAC 390-28-100(1)(e)(ii) <input type="checkbox"/> Spousal: WAC 390-28-100(1)(e)(iv) <input type="checkbox"/> Other: WAC 390-28-100(1)(e)
Explanation of Rule(s)	<p>WAC 390-28-100</p> <p>(1) Under RCW 42.17A.120, the commission or presiding officer may modify reporting requirements, including the statement of financial affairs, if literal application of the requirement would work a manifestly unreasonable hardship and the suspension or modification would not frustrate the purpose of the law. One or more of the following may be considered by the commission or presiding officer as possible qualifications for a reporting modification with respect to the statement of financial affairs, when such standard is met:</p> <p>(b) Income and ownership interests. An applicant may be exempted from reporting the information otherwise required by RCW 42.17A.710 (1)(f) and (g), if:</p> <p>(i) Public disclosure would violate any legally recognized confidential relationship that serves a legitimate business interest;</p> <p>(ii) The information does not relate to a business entity which would be subject to the regulatory authority of the office sought or held by the applicant in whole or in part;</p> <p>(iii) Such reporting would present a manifestly unreasonable hardship to the applicant including but not limited to adversely affecting the competitive position of an entity in which the applicant had an interest of ten percent or more as described in RCW 42.17A.120; and</p> <p>(iv) The interest in question would present no actual or potential conflict with the performance of the duties of the office sought or held.</p>

Supporting Documents (attached)	<input checked="" type="checkbox"/> Modification Request Application <input checked="" type="checkbox"/> F-1 (Amended June 7, 2024)
Reason(s) for Modification (as stated by filer)	<ul style="list-style-type: none">• Dave Fenn is requesting a partial reporting modification that would exempt him from disclosing business customers that paid \$12,000 or more during the reporting period for The Farm Store, Inc., of which he has 50% ownership interest.• In calendar year 2023, The Farm Store, Inc. had 9.4 million in sales with a total of 88,095 transactions. The business has no way of identifying customers who make cash purchases.• Mr. Fenn stated that The Farm Store, Inc. has a large number of customers and that to have staff sort through thousands of sales would be burdensome due to the number of hours it would take and the inability of their system to compile the reportable information.• Mr. Fenn further stated that disclosing the customers could potentially create a competitive disadvantage by providing the list to The Farm Store's competition.
Other Issues	<ul style="list-style-type: none">• Mr. Fenn has agreed to recuse himself if a matter came before him involving a conflict of interest between The Farm Store, Inc. and his official duties with Lewis County Public Utility District 01, if elected.• Mr. Fenn has disclosed payments made by Lewis County to The Farm Store.