

From: [REDACTED]
To: [ALBERT Todd * PRA](#)
Subject: Comment
Date: Thursday, June 11, 2026 9:38:36 AM
Attachments: [attorney_fees_final.pdf](#)

Good Day Todd and members of the Leg Subcommittee

[In RE: 2027 Legislative Concepts for the PRAC Subcommittee: Point 1: "Evidence of need"](#)

Please understand, this is not meant to be a 'Debbie downer comment' merely a "questioning" . After reading the first 12 pages of "Net Metering", the question is: Exactly HOW much trustworthiness credence should be given to the phrase "not bad faith" when departments & agencies have specifically designated divisions for records retention/requests. And specifically, HOW was this 'survey data' vetted - it could very easily be "dirty data" in justification of a plausible deniability (pg 649/ 11, ftnt 44) . Please do not take these words too harshly, however, I just came out of a data-mining adventure - the crass connectivity factors are still a little over enhanced.

[In RE: Net Metering document](#)

First let me state, this article is an excellent position for newspaper avocation of fee waivers; however, if I recall, didn't the legislature foo-foo a similar proposal several years ago as being "one-noted"

Secondly, I take issue with ftnt 94. SEE attached document: **2019 DOJ FOIA** which explains court technicalities of WHO/HOW costs & attorney fees are awarded - to my knowledge this has not been updated - on this point of fact/ opinion I find it (ftnt 94) to be a critical failure of reporting as to WHY newspapers may not be successful at winning costs associated with the investigative background research. Moreover, Chevron "deference" doctrine given to agencies under the APA was struck down in *Loper Bright Enterprises v Raimondo* on 6.28.2024 by the US Supreme Court case: 22.451 while appearing to leave portions of guidance to the courts in *Skidmore v Swift & Co* 323 US 134 on/for reasoning/ reconciliation. And, I could be mistaken in my understanding

Given the FOIA has only been on the books for 60 years whereas the Civil Rights & Housing for **all** since 1863, 163 ago years - where the equality of such is still grossly lagging nationwide, the birth of transparency through FOIA is only one day old, maybe two. . .ya gotta crawl before you walk and run. . . and as a personal thought, back when I was growing up, journalist were always investigative, did the fact checks and background research - to my understanding that was part of their job. Yes data mining is a thankless job because of the time spent conducting & reviewing documents, procuring assets, backdoor access, canvassing. . . and with Ai being used for newspaper articles, accessing data through the connectivity and connective data banks, lines, communications - FOIA may become obsolete as far as the gum-shoe investigative records requests reporting because Ai will have had access, acquired and made

available.

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Respectfully,

/s/ Jo

Jo Barker

Deuteronomy 22 and Exodus 23,

"If you see an animal that is overburdened, you should lighten its load to help it."