

KIRSTIN S. DODGE
Direct: (425) 635-1407
Internet: kdodge@perkinscoie.com

The PSE Building
10885 N.E. Fourth Street, Suite 700
Bellevue, WA 98004-5579
PHONE: 425.635.1400
FAX: 425.635.2400
www.perkinscoie.com

VIA EMAIL & HAND DELIVERY

January 18, 2005

Ms. Carole J. Washburn
Washington Utilities and Transportation
Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

**Re: Puget Sound Energy, Inc. General Rate Case, Consolidated
Docket Nos. UG-040640, UE-040641, UE-031471, UE-032043**

Dear Ms. Washburn:


Enclosed please find an original and 19 copies of the redacted and unredacted versions of Puget Sound Energy, Inc.'s Initial Brief in the above-referenced matter.

Please note that the unredacted version of the Initial Brief, provided herewith in the sealed envelope, is ***Confidential per Protective Order in WUTC Docket Nos. UG-040640 et al.***

For the Commission's convenience, we also enclose 20 copies of the Excerpts of Non-Washington Authorities Cited in Puget Sound Energy, Inc.'s Initial Brief, pursuant to WAC 480-07-395(1)(c)(vi).

Electronic copies of these documents have been emailed to the Commission's records center. Thank you for your assistance in this matter.

Very truly yours,



Kirstin S. Dodge

KSD:pli
Enclosures
cc: Service List (via email and overnight courier)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing letter and enclosures via overnight mail and via email in accordance with WAC 480-07-150(6)(b).

Robert D. Cedarbaum, Senior Counsel
1400 S. Evergreen Park Dr. S.W.
P.O. Box 40128
Olympia, WA 98504-0128
e-mail: BCEDARBA@WUTC.WA.GOV

Simon J. ffitch
Public Counsel Section
Office of Attorney General
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012
e-mail: SIMONF@ATG.WA.GOV

Mike Kurtz
Kurt Boehm
Boehm, Kurtz and Lowry
2110 CBLD Center
36 East Seventh St.
Cincinnati, OH 45202
email: MKURTZLAW@AOL.COM
KBOEHMLAW@AOL.COM

Elaine Spencer
Graham & Dunn
Pier 70
2801 Alaskan Way, Suite 300
Seattle, WA 98121-1128
EMAIL: ESPENCER@GRAHAMDUNN.COM

Danielle Dixon
Policy Associate
NW Energy Coalition
219 First Avenue, Suite 100
Seattle, WA 98104
e-mail: DANIELLE@NWENERGY.ORG

Edward A. Finklea
Chad Stokes
Cable Huston Benedict Haagensen & Lloyd LLP
1001 SW Fifth Avenue, Suite 2000
Portland, OR 97204
e-mail: EFINKLEA@CHBH.COM
CSTOKES@CHBH.COM

Paula E. Pyron
Executive Director
Northwest Industrial Gas Users
4113 Wolf Berry Court
Lake Oswego, OR 97035-1827
e-mail: PPYRON@NYIGU.ORG

Ronald L. Roseman
2011 - 14th Avenue East
Seattle, WA 98112
e-mail: RONALDROSEMAN@COMCAST.NET

S. Bradley Van Cleve
Davison Van Cleve PC
1000 SW Broadway, Ste 2460
Portland, OR 97205
e-mail: MAIL@DVCLAW.COM

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
900 Washington Street, Suite 780
Vancouver, WA 98660
e-mail: DWS@R-C-S-INC.COM

Robert B. Sheppard
30 Glacier Key
Bellevue, WA 98006

John O'Rourke
Citizens' Utility Alliance of Washington
212 W Second Avenue, Suite 100
Spokane, WA 99201
e-mail: OROURKE@SNAPWA.ORG

John A. Cameron
Davis Wright Tremaine LLP
1300 SW Fifth Avenue, Suite 2300
Portland, OR 97201
e-mail: JOHNCAMERON@DWT.COM

James Lazar
Microdesign Northwest
1063 Capital Way South, #202
Olympia, WA 98501
Email: jimlaz@callatg.com

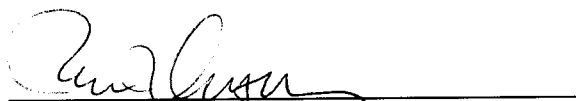
Kevin Higgins
Energy Strategies, LLC
39 Market Street, Suite 200
Salt Lake City, UT 84101
Email: khiggins@energystrat.com

Norman Furuta
Department of the Navy
2001 Junipero Serra Blvd., Suite 600
Daly City, CA 94014
email: NORMAN.FURUTA@NAVY.MIL

Stephen Hill
Hill Associates
P.O. Box 587
Hurricane, WV 25526
Email: HILLSTEPHENG@CS.COM

Kay Davoodi
Navy Rate Intervention
1314 Harwood Street SE
Washington Navy Yard, DC 20374-5018
Email: khojafteh.davoodi@navy.mil

Dated at Bellevue, Washington, this 18th day of January, 2005.


Pam Iverson