

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UG-240884

ORDER 02

PREHEARING CONFERENCE  
ORDER

(Set for August 8, 2025,  
at 9:30 a.m.)

- 1     **NATURE OF PROCEEDING.** On November 15, 2024, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) proposed revisions to rates charged under its natural gas Tariff WN U-2, Schedule 111, the Greenhouse Gas Cap and Investment Adjustment, filing replacement pages on December 3, 2024.
- 2     This matter came before the Commission at its December 19, 2024, Open Meeting. Staff recommended that the Commission suspend the tariff sheets filed by PSE on November 15, 2024, as revised December 3, 2024, but allow the proposed rates to become effective on January 1, on an interim basis, subject to refund, pending the Commission’s final determination in this Docket and Docket UG-230968.
- 3     The scope of this proceeding is limited to the methodology used by PSE to calculate the rates filed in November 2024 as well as specifically addressing forecast of allowance prices.
- 4     **CONFERENCE.** The Commission convened a virtual prehearing conference on March 5, 2025, before Administrative Law Judges Connor Thompson and Bijan Hughes.
- 5     **APPEARANCES.** Sophia E. Amberson represents PSE. Nash Callaghan and Josephine R.K. Strauss represent the Commission. Tad Robinson O’Neill, Jessica Johanson-Kubin, and Robert D. Sykes represents Public Counsel. Sommer J. Moser and Michelle N. Madsen of Davison Van Cleve, P.C. represent the Alliance of Western Energy Consumers (AWEC). Yochanan Zakai of Shute, Mihaly & Weinberger LLP represents

The Energy Project.<sup>1</sup> Contact information for the parties' representatives is attached as Appendix A to this Order.

6     **Intervention.** AWEC filed a Petition for Intervention on February 27, 2025. At the prehearing conference, upon finding that AWEC met the standards set out in Washington Administrative Code (WAC) 480-07-355, the presiding officer orally granted AWEC intervenor status in this matter.

7     **DISCOVERY.** Discovery was made available to the parties in Order 01.

8     **PROCEDURAL SCHEDULE.** The parties presented an agreed procedural schedule at the prehearing conference. Except for the date of the hearing, the Commission adopts the proposed procedural schedule - which is attached to this Order as Appendix B. The parties may modify the date of the settlement conference by providing written notice to the Commission.

9     **DOCUMENT FILING AND SERVICE REQUIREMENTS.** Parties must file and serve all pleadings, motions, briefs, and other pre-filed materials in compliance with all of the following requirements:

- (a) Parties must submit electronic copies of all documents by 5 p.m. on the filing deadline established in the procedural schedule (or other deadline as applicable) unless the Commission orders otherwise. Parties must comply with WAC 480-07-140(6) in formatting, organizing, and identifying electronic files.
- (b) The Commission accepts only electronic versions of documents for formal filing. Parties must submit documents electronically through the Commission's web portal ([www.utc.wa.gov/e-filing](http://www.utc.wa.gov/e-filing)). If a party is unable to use the web portal to submit documents for filing, the Commission will accept a submission via email to [records@utc.wa.gov](mailto:records@utc.wa.gov), provided that the email: (1) explains the reason the documents are not being submitted via the web portal, and (2) complies with the requirements in WAC 480-07-140(5)(b).
- (c) Parties must electronically serve the other parties and provide courtesy electronic copies of filings to the presiding administrative law judge ([Bijan.Hughes@utc.wa.gov](mailto:Bijan.Hughes@utc.wa.gov)) by 5 p.m. on the filing deadline unless the

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<sup>1</sup> The Energy Project made an appearance at the prehearing conference but did not seek intervenor status.

Commission orders otherwise. If parties are unable to email copies, they may furnish electronic copies by delivering them on a flash drive only.

- 10     **EXHIBITS FOR CROSS-EXAMINATION.** Parties are required to file with the Commission and serve all proposed cross-examination exhibits by **Wednesday, June 27, 2025, at 5:00 p.m.** The Commission requires electronic copies in searchable PDF (Adobe Acrobat or comparable software). If any of the exhibits contain information designated as confidential, parties must file an electronic copy of the redacted version in searchable PDF (Adobe Acrobat or comparable software) of each such exhibit. The exhibits must be grouped according to the witness the party intends to cross examine with the exhibits.
- 11     **EXHIBIT LISTS.** With each submission of pre-filed testimony and exhibits, the party making the submission must include a preliminary exhibit list that identifies each submitted exhibit in the format the Commission uses for exhibit lists it prepares for evidentiary hearings. Each party must file and serve a final list of all exhibits the party intends to introduce into the evidentiary record, including all pre-filed testimony and exhibits, as well as cross-examination exhibits by **Wednesday, June 27, 2025, at 5:00 p.m.**
- 12     **CROSS-EXAMINATION TIME ESTIMATES.** Each party must provide a list of witnesses the party intends to cross-examine at the evidentiary hearing and an estimate of the time that party anticipates the cross-examination of that witness will take. Parties should not file witness lists or cross-examination time estimates but must provide them to the administrative law judge ([Bijan.Hughes@utc.wa.gov](mailto:Bijan.Hughes@utc.wa.gov)) and the other parties by email on **Wednesday, June 27, 2025, at 5:00 p.m.**
- 13     **PUBLIC COMMENT HEARING.** The parties agreed to schedule a public comment hearing at a later date.
- 14     **NOTICE OF EVIDENTIARY HEARING.** The Commission will hold a hybrid evidentiary hearing in this docket on **Friday, August 8, 2025, at 9:30 a.m.** Parties may attend the hearing virtually via Zoom. To attend the hearing via Zoom, [click here](#) to join meeting, or call (253) 215-8782 and enter the Conference ID: 841 6377 1028# and use the Passcode: 045201#.
- 15     **ALTERNATE DISPUTE RESOLUTION.** The Commission supports the informal settlement of matters before it. Parties are encouraged to consider means of resolving disputes informally. The Commission has limited ability to provide dispute resolution services. If you wish to explore those services, please contact Connor Thompson, Interim Director, Administrative Law Division (360) 664-1355.

16 **NOTICE TO PARTIES:** A party who objects to any portion of this Order must file a written objection within ten (10) calendar days after the service date of this Order, pursuant to WAC 480-07-430 and WAC 480-07-810. The service date appears on the first page of this Order, in the upper right-hand corner. Absent such objection, this Order will control further proceedings in this docket, subject to Commission review.

DATED at Lacey, Washington, and effective March 25, 2025.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

/s/ Bijan Hughes  
BIJAN HUGHES  
Administrative Law Judge

**APPENDIX A**  
**PARTIES' REPRESENTATIVES**  
**DOCKET UG-240884**

<b>PARTY</b>	<b>REPRESENTATIVE</b>	<b>PHONE</b>	<b>E-MAIL</b>
Utilities and Transportation Commission Staff	Nash Callaghan Josephine R. K. Strauss Utilities and Transportation Division P.O. Box 40128 Olympia, WA 98504-0128	(360) 586-7777	<a href="mailto:Nash.Callaghan@atg.wa.gov">Nash.Callaghan@atg.wa.gov</a> <a href="mailto:Josephine.Strauss@atg.wa.gov">Josephine.Strauss@atg.wa.gov</a>
Puget Sound Energy	Sophia E. Amberson Puget Sound Energy 601 Union St., Ste. 4100 Seattle, WA 98101-2380	(206) 802-3858	<a href="mailto:Sophia.Amberson@pse.com">Sophia.Amberson@pse.com</a> <a href="mailto:Samberson@vnf.com">Samberson@vnf.com</a>
Public Counsel	Tad Robinson O'Neill Jessica Johanson-Kubin Robert Sykes  Washington Attorney General's Office 800 Fifth Avenue, Suite 2000 Seattle, WA 98104-3188	(206) 254-0570 (206) 521-3211 (206) 389-2055	<a href="mailto:Tad.ONeill@atg.wa.gov">Tad.ONeill@atg.wa.gov</a> <a href="mailto:Jessica.Johanson-Kubin@atg.wa.gov">Jessica.Johanson-Kubin@atg.wa.gov</a> <a href="mailto:Robert.Sykes@atg.wa.gov">Robert.Sykes@atg.wa.gov</a>
Alliance of Western Energy Consumers	Sommer J. Moser Michelle N. Madsen Davison Van Cleve, P.C. 107 SE Washington St., Suite 430 Portland, OR 97214	(503) 241-7242	<a href="mailto:sjm@dvclaw.com">sjm@dvclaw.com</a> <a href="mailto:mnm@dvclaw.com">mnm@dvclaw.com</a>

**APPENDIX B  
PROCEDURAL SCHEDULE  
DOCKET UG-240884**

EVENT	DATE
Initial Filing	<b>November 15, 2024</b>
Prehearing Conference	<b>March 5, 2025</b>
First Settlement Conference (parties only)	<b>April 3, 2025</b>
PSE Initial Testimony and Exhibits Due	<b>April 11, 2025</b>
Staff, Public Counsel, and Intervenor Response Testimony and Exhibits Due	<b>May 16 , 2025</b>
Second Settlement Conference (parties only)	<b>May 29, 2025</b>
Notice Issued for Public Comment Hearing	To be determined (TBD) – at least 30 days before the Public Comment Hearing
Public Comment Hearing	TBD
Rebuttal and Cross-answering Testimony and Exhibits Due	<b>June 27, 2025<sup>2</sup></b>
Discovery deadline - Last Day to Issue Discovery Requests	<b>July 17, 2025</b>
Exhibit List, Cross-Examination Exhibits, Witness Lists, Time Estimates, and Exhibit Errata	<b>July 29, 2025</b>
Evidentiary Hearing	<b>August 8, 2025</b>
Simultaneous Post Hearing Briefs	<b>September 4, 2025</b>

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<sup>2</sup> Response time for DRs shortened to 7 business days.