

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY

**Clean Energy Implementation Plan
Pursuant to WAC 480-100-640**

DOCKET UE-210795

**PUGET SOUND ENERGY'S
MOTION FOR CLARIFICATION
OF ORDER 10**

I. INTRODUCTION

1. Pursuant to WAC 480-07-835, Puget Sound Energy ("PSE") hereby requests that the Washington Utilities and Transportation Commission ("Commission") clarify one matter set forth in its Order 10, issued in this proceeding on September 18, 2023 ("Order 10"). In Order 10 the Commission approved participatory funding payment requests made by The Energy Project ("TEP"), NW Energy Coalition ("NWEC"), and Front and Centered ("FAC"). PSE requests the Commission clarify language contained on pages 3, 4, and 5 of Order 10 that directs PSE to assign participatory funding costs in an electric docket to natural gas customers. PSE is not seeking through this motion to change the outcome with respect to this matter, but merely to clarify such requirement.

II. DISCUSSION OF REQUEST FOR CLARIFICATION

2. Consistent with WAC 480-07-835(1), PSE's request for clarification is timely and, using the language included in the rule, intended to "resolve inconsistencies" or "correct patent error without the need for parties to request reconsideration..." An inconsistency and

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error exist regarding payment of costs in an electric docket to natural gas customers. PSE requests that the Commission either confirm that participatory funding costs related to this proceeding should be assigned to natural gas customers or clarify that such payments should only be assigned to electric customers.

3. PSE filed its Clean Energy Implementation Plan (“CEIP”) in this proceeding pursuant to WAC 480-100-640, which applies solely to electric companies.¹ PSE’s CEIP is the company’s initial plan to implement the Clean Energy Transformation Act (“CETA”).² One of the primary purposes of CETA is to modernize Washington’s *electrical* system.³ Accordingly, this proceeding was appropriately assigned an electric only docket. Additionally, each of the payment requests granted in Order 10 was limited to payments of funding related to participation in this proceeding.⁴ Therefore, the requests were limited to payments for participation in an electric only docket.

4. While this proceeding and the requests for payments were related to electric costs, Order 10 appears to follow a standard format, which happens to not be applicable to this proceeding and requires PSE to direct such costs to both electric and natural gas customers, as follows:

¹ See Chapter 480-100 WAC, Electric Companies.

² PSE’s Corrected 2021 Clean Energy Implementation Plan at p. 2 (Feb. 1, 2022).

³ RCW 19.405.010(1). *See also*, RCW 19.405.010(2), “It is the policy of the state to eliminate coal-fired electricity, transition the state’s electricity supply to one hundred percent carbon-neutral by 2030, and one hundred percent carbon-free by 2045.”

Because TEP focuses on issues affecting low-income customers, these costs should be assigned proportionally between electric and natural gas customers based on total billed revenue, and it is appropriate to assess TEP's costs against the residential customer class.⁵

NWEC addresses a number of issues on behalf of a broad cross-section of customers. These costs should be assigned proportionately between electric and natural gas customers based on total billed revenue and should be assessed against all customer classes on an equal percentage basis.⁶

Because FAC is broadly concerned with issues affecting historically under-represented communities, these participatory funding costs should be assigned proportionally between electric and natural gas customers based on total billed revenue and should be assessed and recovered from all customer classes.⁷

PSE, therefore, requests the Commission issue an order that clarifies whether it intended to have the costs assigned to both electric and natural gas customers or it intended to have the costs assigned only to electric customers.

III. CONCLUSION

5. For the reasons set forth above, PSE respectfully requests that the Commission enter an order clarifying Order 10 with respect to the above-referenced issue.

⁴ Request for Payment of Fund Grant of The Energy Project at ¶¶ 4 and 6 (March 23, 2023); Front and Centered's Request for Payment of Fund Grant at ¶¶ 4 and 6 (Aug. 3, 2023); NW Energy Coalition's Request for Payment of Fund Grant at ¶¶ 4 and 6 (Aug. 3, 2023).

⁵ Order 10 at pp 3-4.

⁶ *Id.* at p. 4.

⁷ *Id.* at p. 5.

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