### BEFORE THE

## WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of	of the	Petition	of
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PUGET SOUND ENERGY, INC.

For Approval of its March 2009 Power Cost Adjustment Mechanism Report

DOCKET NO. UE	E-09
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PETITION OF PUGET SOUND ENERGY, INC. FOR APPROVAL OF ITS MARCH 2009 POWER COST ADJUSTMENT MECHANISM REPORT

1. This Petition is brought by Puget Sound Energy, Inc. ("PSE" or the

"Company"). PSE's representative for purposes of this proceeding is:

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and its legal counsel for purposes of this proceeding is:

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2. This Petition brings into issue: WAC 480-07-370(1)(b).

### I. BACKGROUND

# A. The Company's PCA Mechanism Requires Annual True-Up Filings

- 3. In the Commission's Twelfth Supplemental Order in Docket

  Nos. UE-011570 and UG-011571 ("Twelfth Supplemental Order"), the Commission

  approved the parties' Settlement Stipulation for Electric and Common Issues for PSE's

  2001 general rate case ("Stipulation"). Among other things, the Twelfth Supplemental

  Order authorized a Power Cost Adjustment Mechanism ("PCA Mechanism"). Exhibit A

  to the Stipulation, which is attached to the Twelfth Supplemental Order, sets forth details

  regarding the PCA Mechanism, and is hereinafter referred to and cited as the "PCA

  Settlement."
- 4. Following verification of certain numbers set forth in the exhibits to the PCA Settlement, the Commission ordered that revised pages of Exhibits A, B, D and F be substituted for the corollary pages of Exhibits A, B, D and F of the PCA Settlement. The

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Commission further ordered that the resulting adjusted calculations be used for purposes of the PCA accounting required by the PCA Settlement beginning July 1, 2002. *See*Fifteenth Supplemental Order in Docket Nos. UE-011570 and UG-011571 (May 13, 2003). A copy of the PCA Settlement, as revised, is attached to this Petition as Exhibit A.

5. The PCA Settlement describes the PCA Mechanism as a mechanism that would account for differences in PSE's modified actual power costs relative to a power cost baseline. This mechanism would account for a sharing of costs and benefits that are graduated over four levels of power cost variances . . . .

PCA Settlement, ¶ 2. The PCA Settlement sets forth the various levels of costs and benefits sharing between the Company and its customers, and provides that "[t]he customer's share of the power cost variability will be deferred as described below. . . ."

Id. at ¶ 3.

6. In order to implement its sharing provisions, the PCA Settlement requires an annual true-up of actual power costs (versus the normalized level set in rates) and an accounting of sharing amounts. To accomplish this, the PCA Settlement provides that "[i]n August of 2003 and each year thereafter, the Company shall file an annual report detailing the power costs included in the deferral calculation, in a form satisfactory to the Commission, for Commission review and approval." PCA Settlement, ¶ 4.

#### II. PSE'S 2009 PCA REPORT

- 7. In compliance with the PCA Settlement and the Sixteenth Supplemental Order in Docket Nos. UE-011570 and UG-011571 (changing the annual PCA period to a calendar year rather than a fiscal year and approving an annual submittal date of March 31st), this Petition presents to the Commission PSE's Power Cost Adjustment Mechanism Annual Report for the Twelve Month Time Period January 1, 2008 through December 31, 2008—PCA Period Seven ("PCA Annual Report") for the Commission's review and approval. The PCA Annual Report is being filed along with this Petition. Accompanying workpapers are being provided to the Commission Staff and Public Counsel with this filing. As described below, PSE requests that the Commission approve the PCA Annual Report as filed.
- 8. As detailed in PSE's PCA Annual Report, PSE had two different Power Cost Baseline Rates during PCA Period 7. The average power cost baseline rate during PCA Period 7 was \$60.441. As further detailed in PSE's 2009 PCA Report, PSE's actual power costs exceeded the average power cost baseline rate during PCA Period 7 by \$1,194,774 (after adjustment for Firm Wholesale).
- 9. With respect to the deferral balance, as of December 31, 2007, the Company had deferred \$1,804.703 of under-recovered power costs. During PCA Period 7 there was no addition or offset to this amount related to the sharing with customers of an under- or over-recovery. Therefore, the deferred balance at December 31, 2008 is

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\$1,804,703. Interest of \$1,309,440 had been accrued at the end of PCA Period 6. PCA Period 7 interest was \$12,273. Adding the total accrued interest of \$1,321,713 to the deferred balance of \$1,804,703, results in a total customer deferral balance under the PCA mechanism at December 31, 2008 of \$3,126,416.

10. The Company is not requesting any rate increase as part of this filing because the deferral balance is not at a level where an increase is warranted.

# III. REQUESTED ACTION

PSE respectfully requests that the Commission issue an order approving
 PSE's PCA Annual Report, as filed.

DATED: March 31, 2009.

PERKINS COIE LLP

By

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