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S. Bradley Van Cleve

April 26, 2011

David Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
PO Box 47250
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

Re: Docket Nos. UE-110399 and UE-110400

Dear Mr. Danner:

The Industrial Customers of Northwest Utilities (“ICNU”) has been an active participant in Puget Sound Energy’s (“PSE’s”) Conservation Resources Advisory Group (“CRAG”). In addition, ICNU participated in discussions which led to the filing by PSE of revisions to Schedule 120 and Schedule 258. ICNU does not object to the Commission allowing these revisions to become effective May 1, 2011, as recommended by the Staff Report, dated April 28, 2011.

Public Counsel and the NW Energy Coalition have each filed comments in this docket that make numerous claims about the past and future implementation of Schedule 258. ICNU is not in agreement with all of these characterizations; nevertheless, ICNU is willing to pursue good faith discussions in the CRAG process to improve the Schedule 258 program.

ICNU has elected not to oppose the proposed increase in Schedule 120 rates for customers on Schedules 40, 46 and 49, in order to avoid a protracted controversy over this issue. However, the Commission should recognize that the increase in the Schedule 120 charge for some customers is very large. For example, the charge for Schedule 40 is increasing from 1.527 mills/kWH to 4.713 mills/kWH, or an increase of 208%.

ICNU appreciates the opportunity to comment on this matter and looks forward to working with the CRAG to improve Schedule 258.

Sincerely yours,


S. Bradley Van Cleve