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August 23, 2024

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Electronically Filed

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: Docket UG-230470

Dear Executive Director and Secretary Killip:

Puget Sound Energy (“PSE”) is in receipt of the Joint Petition to Compel Compliance with Order 01 and Hear the Petition at the August 29, 2024, Open Meeting submitted by The Energy Project, Staff of the Washington Utilities and Transportation Commission, and NW Energy Coalition in this proceeding on August 20, 2024 (“Petition”). For the reasons set forth below, PSE respectfully requests the Commission deny the request to hear the Petition at the August 29, 2024, open meeting and allow PSE twenty days to respond to the Petition.

The Petition requests that the Commission compel compliance with Order 01 in this proceeding, and PSE disputes the facts and law provided therein. Pursuant to WAC 480-07-370(4)(b), PSE is provided twenty days to respond to a Petition of this sort, and setting the matter for the next open meeting would be inappropriate and would prejudice PSE. The Commission may consider certain petitions at an open meeting, such as an accounting petition,¹ but the Petition in question is not of that sort.

The parties who submitted the Petition did not move for expedited treatment, nor did they provide support for their request to hear their pleading at a regular open meeting. The parties could have filed their petition several months ago,² but they

¹ See WAC 480-07-370(4)(b).

² The parties had notice and were aware of PSE’s compliance filing and “planned actions” no later than April 25, 2024 (see Petition at ¶ 12). The parties met with PSE and discussed PSE’s “planned actions” on May 17, 2024 (see Petition at ¶ 13), the parties had multiple discussions regarding PSE’s “planned actions” over the next several weeks and months (see Petition, ¶¶ 13, 16, 18).

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did not. Now, the parties attempt to shift responsibility for their delay to the Commission, “The Commission must take swift action here...”³

The Commission should reject the parties’ attempt to circumvent the Commission’s procedures and undercut PSE’s right to respond in full to the parties’ allegations. If the Commission does decide the Petition is appropriate for consideration at an open meeting, PSE requests the Commission set it for discussion at an open meeting after September 9, 2024, which would allow PSE the full twenty days to respond.

In summary, PSE respectfully requests that the Commission allow PSE twenty days to provide a comprehensive response to the Petition pursuant to WAC 480-07-370(4)(b), and at that time, decide if the matter is appropriate for adjudication.

Sincerely,

Perkins Coie LLP



Donna L. Barnett

Attorneys for Puget Sound Energy

cc: All Parties

³ Petition at ¶ 35.