

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. _____

PUGET SOUND ENERGY, INC.'S
MOTION FOR EXTENSION OF TIME
TO FILE GENERAL RATE CASE

1. Puget Sound Energy, Inc. ("PSE" or "the Company") files this Motion for Extension of Time To File General Rate Case in conjunction with its power cost only rate case filing dated March 20, 2007 ("2007 PCORC"). PSE's representatives for purposes of this proceeding are:

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I. RELIEF REQUESTED

2. PSE respectfully requests that the Commission waive the requirement that PSE file a general rate case within three months of the effective date of a rate increase resulting from

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the 2007 PCORC. PSE requests that the Commission grant an extension for filing a subsequent general rate case until no later than April 15, 2008.

II. STATEMENT OF FACTS

3. The Power Cost Rate is the product of the parties' settlement of PSE's 2001 general rate case, Docket Nos. UE-011570 and UG-011571. In June 2002, the Commission approved the parties' Settlement Stipulation for Electric and Common Issues in that docket ("Settlement Stipulation"). See Commission's Twelfth Supplemental Order (dated June 20, 2002) ("Twelfth Supplemental Order"). Among other things, the Twelfth Supplemental Order authorized the use of a Power Cost Adjustment Mechanism ("PCA") as a method for adjusting PSE's power costs. See *Settlement Terms for the Power Cost Adjustment Mechanism*, Exhibit A to the Settlement Stipulation. Section 10 of the Exhibit A to the Settlement Stipulation requires the Company to file a general rate case within three months of the effective date of any rate increase resulting from a Power Cost Only Rate Case.

4. Since the parties entered into the Settlement Stipulation, PSE has regularly filed general rate cases with the Commission. In the past six years, PSE has filed three general rate cases¹ and three PCORCs.² It has been less than three months since the Commission issued the final order in PSE's last general rate case, Docket Nos. UE-060266 and UG-060267.

¹ These are the 2001 general rate case, Docket Nos. UE-011570 and UG-011571; the 2004 general rate case, Docket Nos. UG-040640 and UE-040641; and the 2006 general rate case, Docket Nos. UE-060266 and UG-060267.

² These are the 2003 PCORC, Docket No. UE-031725; the 2005 PCORC, Docket No. UE 050870; and the 2007 PCORC.

III. STATEMENT OF ISSUES

5. This motion presents the following issue: Should the Commission waive the requirement that PSE file a general rate case within three months of the effective date of a rate increase resulting from this 2007 PCORC, and should the Commission extend the time for filing a general rate case to no later than April 15, 2008, given that the Company's last general rate case concluded less than three months ago and PSE has regularly been before the Commission with general rate cases and power cost only rate cases over the past six years?

IV. EVIDENCE RELIED UPON

6. In support of this motion, the Company relies upon the records on file with the Commission and the prefiled direct testimonies of Mr. Eric M. Markell and Mr. John H. Story filed concurrently with this motion in the 2007 PCORC filing.

V. AUTHORITY AND ARGUMENT

7. Although Section 10 of Exhibit A to the Settlement Stipulation provides that PSE must file a rate case within three months of the effective date of a rate increase resulting from a PCORC, the Commission has the inherent authority to revise its orders, including orders approving settlement agreements. *See, e.g. WUTC v. Pacific Power & Light Co.*, Docket No. U-84-65, Fourth Supp. Order, at 16-18 (Aug. 2, 1985); *State v. Dep't of Public Service*, 19 Wn.2d 200, 268 (1943) ("Orders by regulatory bodies are always subject to revision in view of changed circumstances."). In this case, the circumstances justify a waiver of the three-month rule.

8. The purpose of Section 10 is to ensure that PSE does not file PCORC proceedings to the exclusion of general rate proceedings. That certainly is not the case here. As discussed

above, PSE has been regularly before the Commission in general rate case proceedings and PCORC proceedings for the past several years. PSE filed general rate cases with the Commission in 2001, 2004, and most recently in 2006. PSE filed PCORC proceedings in 2003, 2005 and 2007. The Commission entered the final order in PSE's most recent general rate case less than three months ago. At that time the Commission had a full opportunity to thoroughly examine the Company's operations, expenses, revenues, and performance.

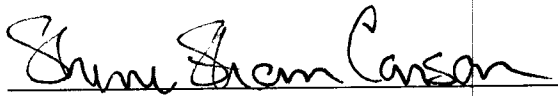
9. General rate cases are expensive and time consuming not only for the Company, but also for Commission Staff, Public Counsel and intervening parties. Given PSE's recent and repeated general rate case filings, it is reasonable to extend the time period for filing a general rate case beyond the three-month time period set forth in Section 10 of Exhibit A to the Settlement Stipulation.

VI. CONCLUSION

10. For the reasons set forth above, PSE respectfully requests that the Commission waive the requirement that PSE file a general rate case within three months of the effective date of any rate increase resulting from this PCORC, and grant an extension for filing a subsequent general rate case until no later than April 15, 2008.

Respectfully submitted this 20th day of March 2007.

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By 
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