

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET NO. UE-011570

PUBLIC COUNSEL'S COMMENTS
REGARDING PSE APPLICATION
FOR AMENDMENT TO RATE
CASE ORDER REGARDING
TERMINATION OF TOU

Public Counsel files this response to Puget Sound Energy, Inc's (PSE) Application for Amendment of Rate Case Order Regarding Time of Use Rates.

Public Counsel does not object to PSE's request to amend the rate order. Based upon the information available to date regarding the program, and the consumer reaction to the quarterly comparison statements issued in October, we believe the amendment is the most appropriate course.

Public Counsel recommends that, in the event the Commission approves the request, it clarify that the Collaborative established by the settlement should provide a report to the Commission based on the data available, in accordance with the Collaborative's report to the Commission of November 1, 2002. We believe it is important to preserve the value of the information and analysis in the form of a report to the Commission.

In addition, we assume that PSE will, as part of the termination of the program, terminate the collection of the portion of TOU costs collected through the conservation tariff rider (ten cents per month per participant). PSE does not presently appear to address that in its filing.

Since the number of participants will become zero, it is our assumption that the amount charged to the conservation tariff rider will also become zero.

DATED this 14th day of November, 2002.

CHRISTINE O. GREGOIRE
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