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**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**IN THE MATTER OF THE JOINT
APPLICATION OF PUGET SOUND
ENERGY, ALBERTA INVESTMENT
MANAGEMENT CORPORATION,
BRITISH COLUMBIA INVESTMENT
MANAGEMENT CORPORATION,
OMERS ADMINISTRATION
CORPORATION, AND PGGM
VERMOGENSBEHEER B.V. FOR AN
ORDER AUTHORIZING PROPOSED
SALES OF INDIRECT INTERESTS
IN PUGET SOUND ENERGY**

Docket U-180680

**JOINT APPLICANTS’ MOTION TO
CORRECT ORDER 06 PURSUANT
TO WAC 480-07-835(1)(c) AND WAC
480-07-875(2)**

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1. Pursuant to WAC 480-07-835(1)(c) and WAC 480-07-875(2), Puget Sound Energy (“PSE”), together with the Alberta Investment Management Corporation (“AIMCo”), the British Columbia Investment Management Corporation (“BCI”), OMERS Administration Corporation (“OMERS”), and PGGM Vermogensbeheer B.V. (“PGGM”) (the “Joint Applicants”), moves and respectfully requests that the Commission correct and clarify two errors in Order 06, filed on March 7, 2019.
2. First, in Order 06, page 18, paragraph 67, in addressing proposed Commitment 43, it states that the \$500,000 annual contribution to low-income weatherization programs would be funded “from shareholder funds.” This

1 statement is incorrect. As provided in Appendix A to the Multiparty Settlement
2 Stipulation, attached to Order 06, proposed Commitment 43 stated that:

3 PSE agrees to continue to fund low-income weatherization
4 programs that the low-income agencies inform PSE they
5 can feasibly achieve with an annual base funding level of
6 no less than \$4.43 million for low-income weatherization
7 programs through December 31, 2022, which amount
8 includes the following:

9 (a) continued annual contributions of \$400,000 from
10 shareholder funds for the Low-Income Weatherization
11 Program; and

12 (b) continued annual contributions of \$500,000 to the Low-
13 Income Weatherization Program for so long as decoupling
14 adopted in Dockets UE-121697 and UG-121705 continues.

15 3. While subpart (a) of proposed Commitment 43 does provide that the
16 \$400,000 in annual contributions will be from shareholder funds, the \$500,000 in
17 annual contributions in subpart (b) will continue to be recovered through the
18 conservation tariff, Schedule 120.

19 4. Accordingly, the Joint Applicants respectfully request that the
20 Commission correct and clarify page 18, paragraph 67, of Order 06, as follows:

21 The new community and low-income commitments
22 preserve financial and staffing resources, which have been
23 updated since the 2008 Acquisition Order, for low-income
24 customers. Commitment 43 requires PSE to continue
25 funding low-income weatherization programs at an annual
26 level of no less than \$4.43 million through December 31,
27 2022, including an annual \$500,000 from Schedule 120
28 from shareholder funds for as long as PSE's decoupling
29 tariff remains in place, and continued annual contributions
30 of \$400,000 from shareholders. . . .

1 5. The Joint Applicants have conferred with Commission Staff, The Energy
2 Project, and the Northwest Energy Coalition on this issue, all of which support the
3 corrections to paragraph 67 proposed above.

4 6. Second, on page 29, paragraph 120, of Order 06, the first sentence
5 incorrectly states “which increase the ownership interest of OAC and BCIMC
6 while granting new ownership interests to OAC and PGGM. . . .” The Joint
7 Applicants believe the first sentence in paragraph 120 should state “AIMCo and
8 BCIMC,” not “OAC and BCIMC,” and respectfully request that the Commission
9 correct the sentence as follows:

10 The proposed transactions, which increase the ownership
11 interest of ~~AIMCo~~OAC and BCIMC while granting new
12 ownership interests to OAC and PGGM. . . .

13 7. For the reasons set forth above, the Joint Applicants respectfully request
14 that the Commission adopt the proposed changes set forth above in Order 06.

15 **Respectfully submitted this 8th day of March, 2019.**
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