

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET NO. UE-121697 and UG-
121705 (Consolidated)

DOCKET NOS. UE-130137 and UG-
130138 (Consolidated)

PUGET SOUND ENERGY, INC.'S
RESPONSE TO JOINT MOTION TO
CONSOLIDATE

1. Puget Sound Energy, Inc. ("PSE") respectfully submits to the Washington Utilities and Transportation Commission ("the Commission") this response to the Expedited Joint Motion to Consolidate of Public Counsel, Northwest Industrial Gas Users, and the Industrial Customers of Northwest Utilities ("Joint Parties") filed March 8, 2013 ("Joint Motion"). The Joint Parties move to consolidate PSE's Expedited Rate Filing ("ERF") proceeding, Docket Nos. UE-130137 and UG-130138, and the decoupling proceeding filed by PSE and NW Energy Coalition, Docket Nos. UE-121697 and UG-121705.

2. PSE has requested that the Commission consider these dockets as open meeting items. Although the decoupling dockets and the ERF dockets are two separate filings, PSE has no objection to the Commission considering the decoupling dockets and the ERF dockets on the same track, through the Open Meeting process, or in the context of a global resolution that addresses common and diverse interests—including breaking "the current pattern of almost

continuous rate cases."¹ However, PSE opposes the efforts of the Joint Parties to use consolidation, suspension, and other tactics to delay the Commission's consideration of these two separate filings, which the Commission has expressed an interest in, and willingness to, consider.

3 The ERF and the decoupling proposals serve two different purposes and have followed different procedural paths. The ERF is an update to PSE's electric and natural gas rates consistent with the methodology introduced by Commission Staff in Docket Nos. UE-111048 and UG-111049.² PSE began meeting with interested stakeholders in June 2012 on this true-up filing, as directed by the Commission, with the goal of filing an expedited rate filing prior to October 2012.

4 The decoupling proposal is a mechanism intended to substantially diminish the throughput incentive that exists under PSE's current ratemaking structure.³ The decoupling mechanism is, in reality, the culmination of two decades of stakeholder efforts, including technical workshops, formal proceedings, the Commission's Decoupling Policy Statement, and settlement negotiations.⁴ The decoupling dockets were filed more than four months ago, significant discovery has been undertaken and two technical conferences have been held.

5. As the Joint Parties recognize, the Commission may exercise discretion on matters of consolidation. Both of these dockets are ripe for consideration by the Commission—either on their own through the Open Meeting process or as part of an anticipated global settlement to be

¹ *WUTC v. Puget Sound Energy, Inc.*, Dockets UE-111048 and UG-111049, Order 08, ¶507 (May 7, 2012).

² See PSE's Cover Letter to David Danner, Docket Nos. UE-130137 and UG-130138 (Feb. 1, 2013).

³ See Amended Petition for Decoupling Petition, at ¶5, Docket Nos. UE-121697 and UG-121705 (March 1, 2013).

⁴ See PSE's Letter to Steven King Regarding Procedures, at 3-4, Docket Nos. UE-121697 and UG-121705 (March 12, 2013).

submitted to the Commission. Accordingly, PSE requests that the Commission exercise its discretion and reject the efforts of the Joint Parties to use consolidation as a means to delay these important filings, which the Commission has encouraged stakeholders to pursue.

DATED: March 13, 2013

Respectfully Submitted,

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