



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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April 23, 2019

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

RE: Miscellaneous Commitments No. 65, Owners of Puget Holdings LLC each file an affidavit with the Commission affirming support for the Commitments
Docket U-180680

Dear Mr. Johnson:

On March 11, 2019, the Washington Utilities and Transportation Commission (Commission) entered Final Order 06 (Corrected) Approving Multiparty Settlement; Authorizing Proposed Transactions (Order 06) in the above-referenced docket. Order 06, among other things, the Commission approved new Commitment 65 which required each of the Owners of Puget Holdings LLC (Puget Holdings) to file with the Commission prior to closing the Proposed Transactions an affidavit affirming support for the Commitments contained in the Settlement Stipulation.¹

On April 17, 2019, the Proposed Transaction in the above-referenced docket closed.

On April 18, 2019, Puget Holdings filed with the Commission (1) the Declaration of Steven Zucchet on Behalf of OMERS Administration Corporation; (2) the Declaration of Lincoln Webb on Behalf of British Columbia Investment Management Corporation; (3) the Declaration of Ahmed Mubashir on Behalf of Alberta Investment Management Corporation; (4) the Declaration of Martijn J. Verwoest on Behalf of PGGM Vermogensbeheer B.V.; and (5) the Declaration of

¹ Order 06 (Corrected), Order Approving Multiparty Settlement; Authorizing Proposed Transactions, 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., Docket U-180680, ¶¶ 88 and 133 (March 11, 2019).

Christopher Hind on Behalf of Canada Pension Plan Investment Board. The filing was made one day after the Proposed Transactions closed. These declarations specifically affirm that each Owner of Puget Holdings supports the Commitments agreed to in Docket U-180680.

Commitment 64 requires PSE to file a report with the Commission regarding any failure to comply with the commitments approved in Order 06 (compliance failure report).

April 19, 2019, Puget Sound Energy (PSE) filed with the Commission a compliance failure report, required by Commitment 64, because Puget Holdings made the required compliance filings related to Commitments 64 and 65 one day late. To prevent future late submissions, Puget Holdings has implemented a schedule and notification process to ensure timely submissions for all such future compliance deadlines.

Commission Staff (Staff) reviewed the compliance documents filed on April 18, 2019, and finds that all five of the declarations are sufficient to comply with Commitment 65. Staff states “sufficient” because a declaration is not an affidavit but generally may be accepted in Washington in lieu of an affidavit (see [RCW 9A.72.085](#)). Because Staff does not have concerns about the authenticity of the declarations, Staff believes that the declarations may satisfy the compliance requirement of Commitment 65. In addition, because Puget Holdings has implemented a process to prevent further missed compliance deadlines Staff recommends that the Commission accept the filing as in compliance with Commission’s Order 06.

Sincerely,

Melissa Cheesman, MPAC
Regulatory Analyst 3