Puget Sound Energy P.O. Box 97034 Bellevue, WA 98009-9734

September 28, 2015

Mr. Steven V. King, Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, Washington 98504-7250

Re:

Docket Nos.: UG-151159 - Advice No. 2015-12

UG-151870 – Advice No. 2015-25

Request for Waiver of WAC 480-90-198

Dear Mr. King:

Pursuant to WAC 480-90-198, Notice Verification and Assistance, Puget Sound Energy, Inc. ("PSE") is providing this statement that it published the attached notice in the above-referenced dockets in accordance with WAC 480-90-194, Publication of Proposed Tariff Changes to Increase Charges or Restrict Access to Services.

On June 1, 2015, PSE filed with the Commission revisions to Schedule 149, the Cost Recovery Mechanism for Pipeline Replacement ("CRM"). On September 18, 2015, PSE filed with the Commission revisions to its purchased gas adjustment ("PGA") Schedules 101 and 106 and at the same time filed an update to the CRM. The CRM and PGA have the same requested effective date of November 1, 2015. The Commissions Policy Statement in Docket No. UG-120715 ("Policy Statement") stated that utilities should file updates to the CRM under the PGA docket for the year, however, because the CRM was initially filed in June, the two filings are under separate dockets as shown above. The revisions to the CRM tariff sheet result in an increase to all 793,924 of PSE's natural gas customers while the PGA revisions result in a decrease to all customers to whom PSE provides commodity service. The net effect of the two filings is a decrease to all sales customers and an increase to all transport customers. The attached notice is a combined notice which follows the intent of the Policy Statement to reflect the CRM and PGA in the same docket.

WAC 480-90-194 requires a notice be published at least 30 days prior to the effective date of a requested filing. Both the PGA and the updated CRM filings which were filed on September 18, 2015, have a requested effective date of November 1, 2015. Publication of the notice on September 28, 2015, meets the requirements of WAC 480-90-194 for both of these filings.

Within ten days of the filing date, WAC 480-90-198 requires a utility to provide confirmation that the required notice was published. Publication of the notice on September 28, 2015, meets the 10 day requirement for the PGA filing, However, it does not meet the 10 day requirement for the initial CRM filing made in June. This non-compliance is the result of the Policy Statement which requires an initial filing in June and an update with the PGA filing for the year. To the extent that failure to meet the 10 day requirement of WAC 480-90-198 while complying with

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WAC 480-90-194 and with the intent of the Policy Statement requires a waiver of WAC 480-90-198, PSE respectfully requests that it be granted such a waiver.

Pursuant to WAC 480-90-198, Notice Verification and Assistance, PSE is providing this statement that it has posted the above-referenced filings in accordance with WAC 480-90-193(1), Posting of Tariffs for Public Inspection and Review; Web, Telephone, and Mail Access by posting on PSE's web site.

PSE also states that notice to the public of the filings referenced above was completed in accordance with WAC 480-90-194(2), Publication of Proposed Tariff Changes to Increase Charges or Restrict Access to Services; Published Notice, by providing notice in the form of a published notice in area newspapers. A copy of the published notice that appeared in area newspapers on September 28, 2015, is attached. PSE also provided a copy of the notice to community agencies, posted the notice on PSE.com and provided notice to news editors of area newspapers, television and radio stations.

Please contact Lynn Logen at (425) 462-3872 for additional information about this notice publication or the posting. If you have any other questions please contact me at (425) 456-2110.

Sincerely

Ken Jøhnson

Director, State Regulatory Affairs

Enclosure

cc:

Simon J. ffitch

Sheree Strom Carson