

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

Petition of

PUGET SOUND ENERGY,

For an Order (1) Authorizing Deferral of
Electricity Conservation Expenditures and
(2) Approving a Tariff Rider for Concurrent
Recovery in Electric Rates of Such Deferred
Electricity Conservation Expenditures.

Docket UE-970686

PUGET SOUND ENERGY, INC.'S
PETITION TO RESCIND SECOND
SUPPLEMENTAL ORDER

I. INTRODUCTION AND RELIEF REQUESTED

1 Pursuant to WAC 480-07-835(1), Puget Sound Energy, Inc. ("PSE" or "the Company") requests that the Commission rescind the Second Supplemental Order in the above-referenced docket, issued on March 29, 2000. The Second Supplemental Order sets forth semi-annual reporting requirements for PSE relating to the progress of electricity conservation programs delivered under Schedule 83, Electricity Conservation Service. Since the Commission issued the Second Supplemental Order, the regulatory landscape has changed and additional reporting requirements have been mandated by state law and Commission rules implementing that law, as well as by agreement of PSE in a conservation-related settlement. In light of these new circumstances, the reports required by the Commission in 2000 have been superseded, are duplicative and are no longer necessary. Accordingly, PSE requests that the Commission rescind the Second Supplemental Order in

this docket or take such other steps it deems necessary to make clear that PSE is no longer required to file semi-annual reports as set forth in the Second Supplemental Order.

2 PSE discussed this petition with its Conservation Resource Advisory Group (“CRAG”) in a regularly-scheduled meeting on June 5. CRAG members include representatives of Commission Staff, Public Counsel, NW Energy Coalition, The Energy Project, WA Department of Commerce, and the Northwest Energy Efficiency Council, among others. The CRAG members in attendance generally supported the petition, and no CRAG member opposed the petition.

3. PSE is engaged in the business of providing electric and natural gas service within the State of Washington as a public service company, and is subject to the regulatory authority of the Commission as to its retail rates, service, facilities and practices. Its full name and mailing address are:

Puget Sound Energy, Inc.
Attn: Ken Johnson
Director, State Regulatory Affairs
P.O. Box 97034
Bellevue, Washington 98009-9734

II. BACKGROUND

4 The Second Supplemental Order in Docket No UE-970686 requires PSE “to submit semi-annual reports on the progress of electricity conservation programs delivered under Schedule 83, Electricity Conservation Service, within 45 days of the end of the second and

fourth quarters, until such time as the tariffed services are no longer offered.¹ The Second Supplemental Order was issued on March 29, 2000. Since that time, PSE has provided (1) annual reports on or about each February 15 and (2) semi-annual reports on or about each August 15 in compliance with the order.

5 A few years after the Second Supplemental Order was issued, PSE's CRAG was formed, in compliance with Exhibit F to the Settlement Stipulation entered into by PSE and the parties to Dockets UE-011570 and UG-011571("2002 Conservation Settlement").² As a part of the relationship between the CRAG and PSE, the CRAG routinely reviews PSE's conservation program progress, typically during formal CRAG meetings.

6 In 2006, Washington voters approved Initiative 937, the Energy Independence Act. Now codified in Chapter 19.285 of the Revised Code of Washington (RCW), the Energy Independence Act and its implementing rules in Chapter 480-109 of the Washington Administrative Code (WAC) require electric utilities to set and meet conservation targets and to report annually to the Commission on progress in meeting conservation targets.

7 For the last several years, PSE has: (i) reported annually to the Commission on its progress in meeting conservation targets pursuant to WAC 480-109-040 and RCW 19.285.070; (ii) filed semi-annual reports on or about February 15 and August 15 to report

¹ Second Supplemental Order, Ordering Paragraph 1.

² Section D of the 2002 Conservation Settlement established the CRAG. The Electric Settlement Terms For Conservation in Docket UE-011570 were modified as part of PSE's Agreed Conditions For Approval of Puget Sound Energy, Inc.'s 2010-2011 Biennial Electric Conservation Targets

on the progress of conservation programs delivered under Schedule 83 as required in Docket UE-970686; and (iii) reported regularly to the CRAG on proposed new program tariff schedules, updates and modifications to its evaluation, measurement and verification (“EM&V”) framework, program achievement results, proposed conservation budgets, and numerous other conservation related issues.

8 In Docket UE-132043, the Commission approved Proposed Conditions for PSE’s 2014-2015 PSE Electric Conservation (“Conservation Conditions”). Section 8 of the Conservation Conditions is titled “Required Reports and Filings.” However, by agreement of CRAG members, the “Required Reports and Filings” in the Conservation Conditions for the 2014-2015 biennium did not include the semi-annual conservation reporting required in Docket UE-970686. CRAG members generally agreed that, at a later date, PSE should request Commission approval to discontinue the semi-annual conservation filings required in Docket UE-970686, in light of the many new reporting obligations that have arisen as a result of the 2002 Conservation Settlement and the Energy Independence Act.

III. AUTHORITY

9 The Commission may rescind a prior order if it gives notice to the affected parties. Specifically, WAC 480-07-875(1) provides as follows:

The Commission may alter, amend, or rescind any order that it has entered, after notice to the public service company or companies

Under RCW 19.285, Docket UE-100177. However, that agreement preserved and reaffirmed the role of the CRAG.

affected and to all parties in the underlying proceeding, and after allowing an opportunity for hearing as in the case of complaints. . . .

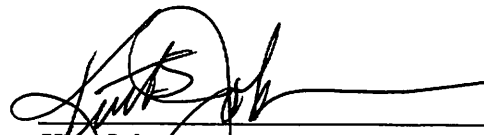
10 The semi-annual reporting requirements set forth in Docket UE-970686 are no longer needed. They have been made duplicative and obsolete by reporting requirements mandated under the Energy Independence Act as well as reporting requirements to the CRAG that PSE undertakes pursuant to the 2002 Conservation Settlement. It is appropriate for the Commission to rescind the Second Supplemental Order as provided for in WAC 480-07-875(1).

IV. CONCLUSION

11 For the reasons set forth above, PSE respectfully requests that the Commission rescind the Second Supplemental Order in Docket UE-970686 requiring semi-annual reporting on conservation, or take such other steps it deems necessary to make clear that PSE is no longer required to file semi-annual reports as set forth in the Second Supplemental Order. PSE requests that the Commission take action on this request at its earliest convenience, and by July 25, 2014, if possible, so that PSE will not be required to prepare its August 15 semi-annual report that is otherwise required in Docket UE-970686.

DATED: June __, 2014

Respectfully Submitted,



Ken Johnson
Director, State Regulatory Affairs
Puget Sound Energy, Inc.

