

November 4, 2009

VIA E-MAIL AND ABC LEGAL MESSENGER

David Danner
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
Olympia, WA 98504-7250

Re: WUTC v. PSE, Docket Nos. UE-072300 and UG-072301
PSE Application to Amend SQI - 9: Disconnection Ratio

Dear Mr. Danner:

Public Counsel has no objection to Puget Sound Energy's Application for Approval of Amendment to Service Quality Index (SQI) Benchmark: Disconnection Ratio, filed on October 16, 2009, which proposes to amend the annual benchmark applied to SQI-9, effective January 1, 2010. Public Counsel believes this element should be retained in the SQI, and that the proposed amendment to increase the benchmark to its prior level appropriately addresses the current technical concerns. It is Public Counsel's belief, however, that such modifications are best handled in a general rate case, where there is the opportunity to review such requests in a broader context and with the better ability to do discovery, file testimony, and present any disputed issues at a hearing. PSE's Service Quality Index was originally developed in the Puget Power & Light/Washington Natural Gas Merger and has been subsequently reviewed in the 2001 and 2007 general rate case context.

To the extent PSE believes in the future that any other modifications to the SQI should be made, those requested modifications should be proposed as part of a general rate case filing, unless there are compelling reasons for separate treatment.

Sincerely,

Simon J. ffitich
Senior Assistant Attorney General
Public Counsel Section
(206) 389-2055

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ALJ Dennis Moss (E-mail)