

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET NOS. UE-072300 and UG-072301
(Consolidated)

RESPONSE OF COMMISSION STAFF TO
PSE MOTION FOR CLARIFICATION OF
ORDER 14

I. INTRODUCTION

1 By motion filed November 23, 2009, Puget Sound Energy, Inc. (“Company”) requests that the Commission clarify Order 14 in this proceeding related to modifications of Service Quality Index (“SQI”) benchmarks. Specifically, the Company seeks clarification that Paragraph 11 of Order 14 does not require all requests for modification to SQI benchmarks to be brought before the Commission only in a general rate case.

2 Order 14 granted the Company’s prior request to revise SQI-9: Disconnection Ratio. Paragraph 11 of Order 14 states only that the next general rate proceeding would be the appropriate docket to examine the revised benchmark if warranted by intervening circumstances:

If experience under the revised standard between now and the time of PSE’s next general rate proceeding indicates a need to revisit this issue, the general rate proceeding would be the appropriate docket in which to bring the issue forward.¹

¹ *WUTC v. Puget Sound Energy, Inc.*, Dockets UE-072300 and UG-072301, Order 14, Paragraph 11 (November 13, 2009).

Thus, Paragraph 11 says nothing about the appropriate forum to examine modifications to other SQI benchmarks. Paragraph 11 does not even preclude review of revised SQI-9: Disconnection Ratio outside of the Company's next general rate case or any rate case for that matter. The Company's requested clarification, therefore, appears unnecessary.

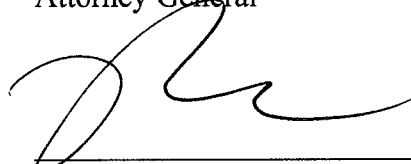
3 Nevertheless, Staff agrees with the Company that the process and procedure of a general rate case may not be the appropriate vehicle when a timely SQI modification is needed to respond to change in the external conditions.² Staff also concurs that a litigated rate case is not always the most effective and efficient way to address SQI issues.

4 Therefore, to the extent that clarification of Order 14 is necessary, Staff supports the Company's motion and recommends that the motion be granted.

DATED this 24th day of November 2009.

Respectfully submitted,

ROBERT M. MCKENNA
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² PSE Motion at Paragraph 4.