

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PUGET SOUND ENERGY, INC.,
and NORTHWEST ENERGY COALITION

For an Order Authorizing PSE to Implement
Electric and Natural Gas Decoupling
Mechanisms and to Record Accounting
Entries Associated With the Mechanisms

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKETS UE-121697
and UG-121705 (consolidated)

DOCKETS UE-130137
and UG-130138 (consolidated)

JOINT MOTION FOR MINISTERIAL
AMENDMENT

1 The undersigned parties jointly make this motion pursuant to WAC 480-07-875 for a ministerial amendment to Order 07 in Dockets UE-121697 and UG-121705 (consolidated) and Dockets UE-130137 and UG-130138 (consolidated).

I. MOTION

2 The Commission may, at any time, alter or amend any order that it has entered.¹ The undersigned parties believe that the Commission should amend its order to identify the docket in which it will review, consider, and address issues related to Puget Sound Energy, Inc.'s ("Puget" or "the Company") decoupling conservation commitments, including

¹ RCW 80.04.210; WAC 480-07-875(1).

compliance with these commitments.² The parties believe that this is only an administrative, or ministerial, matter.

3 In Order 07, the Commission approved the decoupling mechanism proposed by the Company and the Northwest Energy Coalition.³ It included a commitment that the Company will “achieve electric conservation five percent above the biennial targets set by the Commission, and [the Company] will agree to voluntarily submit to financial penalties for failing to meet this higher level of conservation achievement.”⁴ Because of the direct link between these decoupling conservation commitments and the Company’s biennial conservation target, issues related to the Company’s compliance with both the target and the decoupling conservation commitment should be considered by the Commission in the same dockets, going forward.⁵

4 A utility’s biennial conservation plan, target, and report are filed in the same docket. The biennial conservation target is included in a utility’s biennial conservation plan.⁶ The biennial conservation report must be filed in the same docket as the biennial conservation plan.⁷ It shows a utility’s progress towards complying with its target.⁸ Issues related to compliance with a biennial conservation target are then addressed in this same docket.⁹

5 Granting the parties’ joint motion would direct the Company, and other parties, to make filings on issues related to the Company’s decoupling conservation commitments in

² The Company’s decoupling conservation commitments can be found in Order 07 at paragraphs 108 and 112.

³ Order 07, ¶ 136.

⁴ Amended Decoupling Petition at 17; *see* Order 07, ¶ 108.

⁵ The current biennial conservation docket for PSE is Docket UE-152058.

⁶ WAC 480-109-120(1). The biennial conservation plan must be filed with the Commission on or before November 1 of each odd-numbered year. WAC 480-109-120(1).

⁷ WAC 480-109-120(4). The biennial conservation report must be filed on or before June 1 of each even-numbered year. WAC 480-109-120(4).

⁸ WAC 480-109-120(4).

⁹ WAC 480-109-120(5).

the same dockets, going forward, as the Company's biennial conservation plan and report. This would include any filings about the use of excess conservation towards compliance with a decoupling conservation commitment. Order 07 would remain the authoritative document establishing the Company's decoupling conservation commitments.

II. RELIEF REQUESTED

6 The undersigned parties jointly request that the Commission effect an administrative amendment granting the parties' motion and indicating that, consistent with Commission Order 07 in Dockets UE-121697 and UG-121705 (consolidated) and Dockets UE-130137 and UG-130138 (consolidated), issues related to the Company's decoupling conservation commitments, including compliance with the decoupling conservation commitments, will be considered in the same dockets, going forward, as the Company's biennial conservation plan and report.

//

//

//

//

//

//

//

//

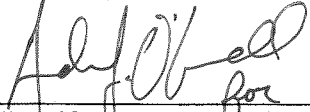
//

//

//

Dated this 15th day of September 2016.

ROBERT W. FERGUSON
Attorney General




Jennifer Cameron-Rulkowski
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

PERKINS COIE LLP

Sheree Strom Carson
Donna L. Barnett
Attorneys for Puget Sound Energy

EARTHJUSTICE

ROBERT W. FERGUSON
Attorney General




Electronic Approval given 9/15/16 at 11:48 a.m.

Lisa W. Gafken
Assistant Attorney General
Public Counsel Unit


Amanda W. Goodin
Counsel for NW Energy Coalition

DAVISON VAN CLEVE, PC



Electronic Approval given 9/16/16 at 8:58 a.m.
Tyler Pepple
Counsel for ICNU

FEDERAL EXECUTIVE AGENCIES



Rita M. Liotta
Counsel for Federal Executive Agencies

THE ENERGY PROJECT

Shawn Collins
Director

Dated this 15 day of September 2016.

ROBERT W. FERGUSON
Attorney General

Jennifer Cameron-Rulkowski
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

ROBERT W. FERGUSON
Attorney General

Lisa W. Gafken
Assistant Attorney General
Public Counsel Unit

FEDERAL EXECUTIVE AGENCIES

Rita M. Liotta
Counsel for Federal Executive Agencies

PERKINS COIE LLP



Sheree Strom Carson
Donna L. Barnett
Attorneys for Puget Sound Energy

EARTHJUSTICE

Amanda W. Goodin
Counsel for NW Energy Coalition

DAVISON VAN CLEVE, PC

Tyler Pepple
Counsel for ICNU

THE ENERGY PROJECT

Shawn Collins
Director

Dated this ____ day of September 2016.

ROBERT W. FERGUSON
Attorney General

Jennifer Cameron-Rulkowski
Assistant Attorney General
Counsel for Washington Utilities and
Transportation Commission Staff

ROBERT W. FERGUSON
Attorney General

Lisa W. Gafken
Assistant Attorney General
Public Counsel Unit

FEDERAL EXECUTIVE AGENCIES

Rita M. Liotta
Counsel for Federal Executive Agencies

PERKINS COIE LLP

Sheree Strom Carson
Donna L. Barnett
Attorneys for Puget Sound Energy

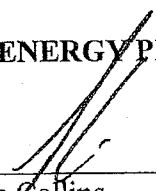
EARTHJUSTICE

Amanda W. Goodin
Counsel for NW Energy Coalition

DAVISON VAN CLEVE, PC

Tyler Pepple
Counsel for ICNU

THE ENERGY PROJECT



Shawn Collins
Director