**BEFORE THE WASHINGTON   
UTILITIES AND TRANSPORTATION COMMISSION**

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| 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).
2. **MOTION**
3. The Commission may, at any time, alter or amend any order that it has entered.[[1]](#footnote-2) 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 compliance with these commitments.[[2]](#footnote-3) The parties believe that this is only an administrative, or ministerial, matter.
4. In Order 07, the Commission approved the decoupling mechanism proposed by the Company and the Northwest Energy Coalition.[[3]](#footnote-4) 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]](#footnote-5) 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]](#footnote-6)
5. 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]](#footnote-7) The biennial conservation report must be filed in the same docket as the biennial conservation plan.[[7]](#footnote-8) It shows a utility’s progress towards complying with its target.[[8]](#footnote-9) Issues related to compliance with a biennial conservation target are then addressed in this same docket.[[9]](#footnote-10)
6. 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 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.
7. **RELIEF REQUESTED**
8. 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.

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Dated this \_\_\_\_\_ day of September 2016.

**ROBERT W. FERGUSON**

**Attorney General**

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**EARTHJUSTICE**

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**THE ENERGY PROJECT**

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Shawn Collins

Director

1. RCW 80.04.210; WAC 480‑07‑875(1). [↑](#footnote-ref-2)
2. The Company’s decoupling conservation commitments can be found in Order 07 at paragraphs 108 and 112. [↑](#footnote-ref-3)
3. Order 07, ¶ 136. [↑](#footnote-ref-4)
4. Amended Decoupling Petition at 17; *see* Order 07, ¶ 108. [↑](#footnote-ref-5)
5. The current biennial conservation docket for PSE is Docket UE‑152058. [↑](#footnote-ref-6)
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). [↑](#footnote-ref-7)
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). [↑](#footnote-ref-8)
8. WAC 480‑109‑120(4). [↑](#footnote-ref-9)
9. WAC 480‑109‑120(5). [↑](#footnote-ref-10)