



November 2, 2018

Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250 Olympia, WA 98504-7250

**RE: Puget Sound Energy's Proposed Sale of Non-Controlling Interest in Puget Holdings LLC, Docket U-180680**

Dear Commission Chairman Danner,

Regarding the application filed on September 5, 2018 by Puget Sound Energy (PSE), I respectfully request the following.

**1) The UTC should conduct a full review of this transfer in ownership.**

Several years ago Washington state legislation passed requiring the Utilities and Transportation Commission (UTC) to use a "net benefit" standard for the sale of interests by a private utility if the sale results in "a person, directly or indirectly, acquiring a controlling interest in a gas or electrical company."

It is my understanding that if the transaction is approved, Canadian pension funds, that are ultimately answerable to the Canadian government at the province or federal level, will own 90% of PSE. The intent of the state legislation was to ensure that the Commission required "that a net benefit to customers be shown in order to approve the acquisition of the franchises, properties, or facilities owned by a gas or electrical company in the state."

Legislation and public policy changes related to pensions and the economic health of Canada all need to be reviewed when it comes to the sale of PSE. This is the only opportunity we have to vet the proposed merger, and identify opportunities to improve safety, reliability, and service to PSE ratepayers.

**2) The UTC should look at how Puget Sound Energy's lowest-paid workers have fared.**

It is my understanding, PSE made merger commitments related to low-income customers, charitable contributions, staffing and a local presence. I am concerned that those commitments had minimal impact to address the unequal economic conditions that have occurred under PSE's current owners. Contracted-out workers performing traffic control for PSE are eligible for energy assistance programs due to their low wages and in-house employees at Puget enjoy the benefits and protections of good union jobs, other workers do not. High turnover, low wages, and dangerous working conditions in traffic control run counter to this mandate.

Therefore, I urge you to consider whether the proposed transaction will provide a net benefit to PSE ratepayers.

Sincerely,

Frank Chopp  
Speaker of the House

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