



June 28, 2023

**Via Electronic Filing**

Attn: Amanda Maxwell, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
P.O. Box 47250  
Lacey, WA 98503

Re: Request to Extend the Deadline for Written Comments on Puget Sound Energy Gas Climate Commitment Act Tariff (UG-230470)

Dear Director Maxwell:

The NW Energy Coalition (“NWEC”) respectfully requests the Washington Utilities and Transportation Commission (“Commission”) extend the deadline for written comment on Puget Sound Energy’s (“PSE”) application to establish a new tariff schedule to recover allowance costs under the Climate Commitment Act (“CCA”), Docket UE-230470.

A Notice of Opportunity to File Written Comments on PSE’s *new* tariff was published on June 23, 2023 establishing a deadline of July 3, 2023, a mere six (6) business days for interested stakeholders to read and prepare comments on the filing. Even if time consideration was taken from the date of filing (June 9, 2023), stakeholders would have only twenty-three (23) calendar days to respond to a complicated and technical request from the state’s largest utility concerning a first-of-its-kind tariff filing on a complex and new regulatory program with significant customer bill impacts.

NWEC acknowledges that PSE held public stakeholder meetings regarding cost recovery and accounting treatment of allowances under the CCA. However, stakeholders were not provided an opportunity to review the tariff before it was filed, and these informal company-led meetings are not a substitute for due process before the Commission. Stakeholders that engaged in the public process prior to filing must still have adequate time to digest the technical aspects of the filing before attempting to respond. A truncated amount of time to do so inherently decreases the quality of responses provided to the Commission.

Furthermore, stakeholders that did not engage in the company-led process and/or are not on the public service list for the docket must be given an adequate amount of time to:

i) become aware that a filing has been made; ii) read and understand the filing – which may or may not require outside technical assistance; and iii) prepare coherent written comments that provide meaningful feedback to the Commission.

Lastly, PSE’s filing is the first of its kind since the passage of the CCA. As a matter of first impression before the Commission, and despite PSE’s attempt to expedite the process, NWECC encourages the Commission to provide ample opportunity for stakeholders to respond to the unique and complex filing.

As such, NWECC respectfully requests that the Commission extend the deadline for comment to July 21, 2023, twenty-eight (28) calendar days from publication of the June 23<sup>rd</sup> Notice.

Respectfully submitted,

*/s/ Lauren McCloy*

---

Lauren McCloy  
Policy Director  
NW Energy Coalition  
811 1<sup>st</sup> Ave. Suite 305  
Seattle, WA 98104  
(509) 201-3581  
[lauren@nwenergy.org](mailto:lauren@nwenergy.org)