

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-072300

Docket No. UG-072301

PUGET SOUND ENERGY, INC.'S  
MOTION FOR CLARIFICATION OF  
ORDER NO. 21

1 Pursuant to WAC 480-07-835, Puget Sound Energy, Inc. ("PSE ") requests that the Commission clarify a matter set forth in Order 21 in this proceeding related to the waiver and the suspension of certain Service Quality Index ("SQI") requirements regarding SQI Nos. 6 and 8. PSE is not seeking through this motion to change the outcome of Order 21, which 1) authorized PSE to replace its designated SQI Nos. 6 and 8 survey provider, and 2) ordered PSE to file a written confirmation regarding the identity of the new survey provider and to provide certain assurances regarding the survey methodology to be used by the new provider. Rather, PSE seeks clarification of the filing due date referenced in paragraphs 2 and 13 of Order 21.

2 Specifically, PSE requests clarification that Paragraph 13 does not change the due dates for any of PSE's routine SQI performance reports because Paragraph 13 appears to refer to the date of PSE's first SQI performance report for 2013 as July 15, 2013, rather than

July 30, 2013. The Service Quality Program Mechanics<sup>1</sup> provides that the due date for the semi-annual performance reports is on or about July 30 of each year. Accordingly, PSE requests clarification that the July 15, 2013 date referenced in paragraph 13 of Order 21 is only applicable to the filing of the written confirmation about SQI Nos. 6 and 8 surveys. The filing requirements of the routine SQI performance reports were not addressed in PSE's petition, nor has PSE had a full and fair opportunity to provide input to the Commission on this issue.

3           It appears that in paragraphs 2 and 13 of Order 21, the Commission incorrectly referred to the due date for PSE's semi-annual performance reports as July 15 rather than July 30. Therefore, PSE requests clarification that the July 15, 2013 due date is only applicable to the filing of the written confirmation about SQI Nos. 6 and 8 surveys so that PSE may proceed with its current preparation schedule for the filing of the first 2013 SQI performance report due "on or about July 30 (for semi annual report of performance for January through June)".<sup>2</sup>

4           For these reasons, the Company requests that the Commission clarify that Order 21 was not intended to alter the filing due dates of PSE's SQI performance reports. This issue was not addressed in PSE's petition, nor has PSE had a full and fair opportunity for input on this issue. If Order 21 was intended to amend the due dates of PSE's first SQI performance reports, PSE respectfully requests the Commission treat this motion as a motion for

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<sup>1</sup> See *WUTC v. Puget Sound Energy, Inc.*, Dockets Nos. UE-011570 & UG-011571, Twelfth Supplemental Order: Rejecting Tariff Filing, Approving and Adopting Settlement Stipulation Subject to Modifications, Clarifications, and Conditions; Authorizing and Requiring Compliance Filing (June 20, 2002) (Section G, page 15, of Appendix 2 to Exhibit J of Settlement Stipulation).


<sup>2</sup> *Id.*

reconsideration under WAC 480-07-850 and allow PSE a full opportunity to address this issue in briefing before the Commission.

**DATED:** April 17, 2013

Respectfully Submitted,

**PERKINS COIE LLP**

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