

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE-240004 and Docket UG-
240005 (*consolidated*)**

In the Matter of the Petition of,

PUGET SOUND ENERGY

Petitioner,

**For an Accounting Order Authorizing
deferred accounting treatment of
purchased power agreement expenses
pursuant to RCW 80.28.410**

Docket UE-230810

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

Docket UG-230968

**PUGET SOUND ENERGY'S
RESPONSE TO STAFF'S MOTION TO
CONSOLIDATE**

1. Pursuant to WAC 480-07-375(4), Puget Sound Energy (“PSE”) hereby submits the following response to WUTC Staff’s Motion to Consolidate (“Motion”). Staff’s Motion requests the Commission consolidate the General Rate Case (“GRC”) dockets, UE-240004, UG-240005, and UE-230810, with the Climate Commitment Act forecast filing docket, UG-230968 (“CCA Docket”). PSE does not oppose the Motion but requests the Commission make it clear to the parties in both dockets that consolidation does not expand the issues involved beyond the issues in the GRC dockets and the CCA Docket.

2. The only issue identified for adjudication in the CCA Docket is the design of a potential risk-sharing mechanism for CCA compliance costs¹ and that should be the only new issue consolidated with PSE’s general rate case. The concern that the CCA Docket could be used to expand the issues beyond those identified by the Commission² was raised by PSE at the prehearing conference for the CCA Docket. No party objected to limiting the scope of the proceeding to one issue, the risk-sharing mechanism, and the Commission accordingly included that clear limitation in its order.³ Similarly, PSE is concerned the scope of the consolidation of the CCA Docket with PSE’s general rate case could expand beyond the risk-sharing mechanism unless otherwise clearly limited.

3. Should the Commission grant the Motion, the Commission should make it clear, just as it did in Order 02 of the CCA Docket, the only added issue to the GRC dockets through

¹ See Docket UG-230968, Order 01 ¶ 14.

² *Id.*

³ See Docket UG-230968, Order 02 ¶ 19.

consolidation is the design of a potential risk-sharing mechanism for costs incurred as a result of the Climate Commitment Act.

RESPECTFULLY SUBMITTED this 15th day of May, 2024.

PERKINS COIE LLP

By *s/ Sheree Strom Carson*
Sheree Strom Carson, WSBA #25349
Pamela J. Anderson, WSBA #37272
Donna L. Barnett, WSBA #36794
David S. Steele, WSBA #45640
Byron C. Starkey, WSBA #55545
Attorneys for Puget Sound Energy