

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET NO. UE-141141
	)	
Complainant,	)	
	)	MOTION OF THE INDUSTRIAL
v.	)	CUSTOMERS OF NORTHWEST
	)	UTILITIES FOR PERMISSION TO
PUGET SOUND ENERGY,	)	REPLY TO ANSWER OF PUGET
	)	SOUND ENERGY, INC.
Respondent.	)	
	)	

1 Pursuant to WAC 480-07-370(1)(d)(ii), the Industrial Customers of Northwest Utilities (“ICNU”) files this motion for leave to file a reply to the “Answer of Puget Sound Energy, Inc. to Petition for Accounting Order of The Industrial Customers of Northwest Utilities” (“Answer”), filed on August 28, 2014. Permission to reply is appropriate because the Answer raises new material requiring a response and ICNU’s reply will shed additional light on matters asserted by Puget Sound Energy, Inc. (“PSE” or the “Company”) in the Answer. Attached to this Motion, ICNU files its proposed reply (“Reply”) with the Washington Utilities and Transportation Commission (the “Commission”).

2 The additional information found in ICNU’s Reply should clarify the issues, and will assist the Commission. ICNU’s Reply responds to allegations made by PSE and sheds additional light on matters asserted in the Answer, thereby providing good cause for the Commission to grant permission for the Reply.<sup>1/</sup> For example, the Company alleges that ICNU mischaracterizes a Commission notice.<sup>2/</sup> In so doing, however, PSE not only misinterprets the

---

<sup>1/</sup> See In Re the Six-Month Review of Quest Corp.’s Performance Assurance Plan, Docket No. UT-033020, Order 06 at ¶¶ 5-6 (Feb. 4, 2004).  
<sup>2/</sup> Answer at ¶ 11.

Petition, but also misrepresents the Thurston County Superior Court Order (“Court Order”) which forms a basis of the Petition.<sup>3/</sup> In order to assist the Commission, the Reply clarifies both ICNU’s statements in the Petition and sheds additional light on the Court Order prompting the Petition. Likewise, the Reply responds to allegations made in the Answer and sheds further light on the Company’s denials and characterizations regarding return on equity, rate legality, the Court Order, and remand proceedings.<sup>4/</sup>

3 For the foregoing reasons, ICNU respectfully requests that the Commission grant permission for the filing of the attached Reply.

Dated in Portland, Oregon, this 5th day of September, 2014.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.



Melinda J. Davison  
Jesse E. Cowell  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204  
(503) 241-7242 telephone  
(503) 241-8160 facsimile  
mjd@dvclaw.com  
jec@dvclaw.com  
Of Attorneys for Industrial Customers  
of Northwest Utilities

---

<sup>3/</sup> See the Court Order attached to the Petition.

<sup>4/</sup> E.g., Answer at ¶¶ 9, 11, 12, 15.