

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition by

PUGET SOUND ENERGY,

Seeking Exemption from the Provisions
of WAC 480-80-105(4)(b) Requiring
Electric Companies to Use Specific
Coding Symbols to Signify Changes to
Revised Tariff Sheets

DOCKET UE-180091

ORDER 01

ORDER GRANTING EXEMPTION
FROM RULE

BACKGROUND

- 1 On January 31, 2018, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) revisions to its electric Tariff WN U-60, Schedule 85 – Line Extensions and Services Lines (Line Extension Tariff) and, concurrently, a petition for exemption from rule regarding the labeling of changes in tariff sheets as described in WAC 480-80-105(4)(b) (Petition).
- 2 This Petition was filed following discussions with Staff about numerous revisions to PSE’s Line Extension Tariff. Since 2015, PSE has been working collaboratively with Staff to update the Line Extension Tariff. Part of this work included updating the specific rates of the tariffs for both costs and margin allowances.
- 3 The revisions to the Line Extension Tariff also included non-substantive and formatting changes that were designed to increase clarity and improve readability. Because these changes were significant in scope, but not substance, PSE is requesting an exemption from WAC 480-80-105(4)(b), which requires each electric utility to code all revisions to tariff sheets using a specific set of symbols and format. These rules are designed to ensure the purpose and effect of each proposed change is properly reflected.
- 4 Instead of labeling each change based on the codes in WAC, PSE proposes to simplify the labeling using only the symbol “T” for “change in text for clarification.”
- 5 PSE notes in its Petition that it does not propose that an exemption apply to any substantive changes. Such changes, including those to individual rates or margin allowances, will be coded as the rule requires.

6 Under WAC 480-100-008, the Commission may grant an exemption from the provisions of any rule in WAC 480-100 if consistent with the public interest, the purposes underlying regulation and applicable statutes. See also WAC 480-07-110. After reviewing PSE's filing for an exemption, Commission staff (Staff) recommends granting the Petition.

DICUSSION

7 We agree with Staff's recommendation and grant PSE's request for an exemption from the coding requirements of WAC 480-80-105(4)(b) as they apply to the non-substantive changes to the Company's proposed tariff revisions. As PSE notes in its Petition, complying with the coding requirements would require substantial effort and would create tariff sheets that are virtually unreadable. We find that the additional administrative burden of complying with the rule in this instance will not assist Staff in its evaluation of the proposed revisions, and, in fact, would make it that evaluation more difficult. Accordingly, we conclude that granting the exemption is consistent with the public interest, the purposes underlying regulation, and applicable statutes.

FINDINGS AND CONCLUSIONS

- 8 (1) The Commission is an agency of the State of Washington vested by statute with the authority to regulate rates, rules, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including electric companies.
- 9 (2) Puget Sound Energy is engaged in the business of providing electric services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 10 (3) Puget Sound Energy is subject to WAC 480-80-105(4)(b), which requires electric companies to code all changes to a tariff each time it is revised.
- 11 (4) Under WAC 480-100-008, the Commission may grant an exemption from the provisions of any rule in WAC 480-100 if consistent with the public interest, the purposes underlying regulation and applicable statutes. See also WAC 480-07-110.

- 12 (5) This matter came before the Commission at its regularly scheduled meeting on August 9, 2018.
- 13 (6) After reviewing Puget Sound Energy's filing in Docket UE-180091 on August 9, 2018, and giving due consideration, the Commission finds that the exemption is consistent with the public interest, the purposes underlying regulation, and applicable statutes, and should be granted.

ORDER

THE COMMISSION ORDERS:

- 14 (1) Puget Sound Energy is granted a one-time exemption from WAC 480-80-105(4)(b) for coding each non-substantive change to its electric Tariff WN U-60, Schedule 85 – Line Extensions and Services Lines.
- 15 (2) The Commission retains jurisdiction over the subject matter and Puget Sound Energy to effectuate the provisions of this Order.

The Commissioners, having determined this Order to be consistent with the public interest, directed the Secretary to enter this Order.

DATED at Olympia, Washington, and effective this August 9, 2018.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARK L. JOHNSON, Executive Director and Secretary