

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

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In the Matter of

PUGET SOUND ENERGY,

Report Identifying Its 2014-2023 Ten-Year
Achievable Electric Conservation Potential
and Its 2014-2015 Electric Biennial
Conservation Target Under RCW
19.285.040 and WAC 480-109-010

Docket UE-132032

Docket UE-132043

PUGET SOUND ENERGY, INC.'S
MOTION FOR CLARIFICATION OF
ORDER 01

I Pursuant to WAC 480-07-835, Puget Sound Energy, Inc. ("PSE" or "the Company") requests that the Commission clarify an apparent inconsistency in Order 01 in the above-referenced dockets. PSE is not seeking through this motion to change the outcome of Order 01, which (i) approved PSE's 2014-2023 ten-year achievable conservation potential, (ii) approved PSE's 2014-2015 biennial conservation target, and (iii) suspended PSE's tariff revision in WN U-60, Tariff G, Sheet 292-A providing for incremental recovery of

expenditures related to PSE's Conservation Voltage Reduction ("CVR") program. Rather, PSE seeks clarification of an apparent inconsistency in paragraphs 14 through 16 and paragraph 26 of Order 01.

2 In paragraph 14 of Order 01, the Commission states that it is appropriate to suspend the CVR program tariff, WN U-60, Tariff G, Sheet 292-A and encourages PSE, Staff and other stakeholders to work collaboratively to resolve the issue of incremental cost recovery of CVR labor expenditures. Specifically, the Commission states:

14. The Commission agrees that suspension of the CVR program tariff is appropriate. The Company is encouraged to work collaboratively with Staff and the other stakeholders to resolve the issue of incremental cost recovery of CVR labor expenditures.¹

Thus, the language in paragraph 14 indicates that the Commission has not predetermined whether recovery of CVR expenditures through PSE's Conservation Rider is permitted.

3 In contrast, paragraph 16 of Order 01 expressly prohibits recovery of CVR expenditures through the Company's Conservation Rider.

16. For the above reasons, we approve PSE's 2014-2023 achievable conservation potential of 2,730,408 MWh and its 2014-2015 biennial conservation target of 485,770 MWh subject to the conditions set forth in Appendix A attached to this Order, including condition 11(d) prohibiting recovery of CVR expenditures through the Company's Conservation Rider. In addition, the tariff revisions in WN U-60, Tariff G, Sheet 292-A should be suspended.²

¹ Order 01, ¶ 14.

² Order 01, ¶ 16. Paragraph 26, which approves the ten-year achievable conservation potential and the biennial conservation target subject to the conditions contained in Appendix A, also would prohibit recovery of costs associated with CVR.

This language would seem to indicate that the Commission has in fact already determined that PSE may not seek recovery of CVR expenditures through its Conservation Rider-- despite the fact that the Commission has suspended the tariff and encouraged the parties to work together collaboratively to resolve this issue.

4 It is unlikely parties will work collaboratively with PSE to address whether CVR expenditures should be recovered through the Conservation Rider, as the Commission requests in paragraph 14 of Order 01, when the Commission has prohibited recovery of these expenditures through the Conservation Rider in paragraph 16 of Order 01.

5 In light of the above apparent inconsistency, PSE respectfully requests that the Commission add clarifying language to paragraphs 16 and 26 of Order 01, as shown below:

14. The Commission agrees that suspension of the CVR program tariff is appropriate. The Company is encouraged to work collaboratively with Staff and the other stakeholders to resolve the issue of incremental cost recovery of CVR labor expenditures.

15. The remaining conditions, proposed by Staff and developed in collaboration with PSE and the CRAG, are similar to those imposed by the Commission in approving PSE's last conservation report. Both Public Counsel and Staff praise the effectiveness of the prior conditions and recommend continuation. The Commission agrees with the stakeholders that the remaining conditions set forth in Appendix A to this Order are appropriate and should be continued.

16. For the above reasons, we approve PSE's 2014-2023 achievable conservation potential of 2,730,408 MWh and its 2014-2015 biennial conservation target of 485,770 MWh subject to the conditions set forth in Appendix A attached to this Order, including condition 11(d) prohibiting recovery of CVR expenditures through the Company's Conservation Rider until such time as the Commission makes a determination on the merits of the issue of incremental cost recovery of CVR labor expenditures in Docket UE-132032 (suspending WN U-60, Tariff G, Sheet 292-A).

In addition, the tariff revisions in WN U-60, Tariff G, Sheet 292-A should be suspended.

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THE COMMISSION ORDERS:

26. (1) Puget Sound Energy's 2014-2023 ten-year achievable conservation potential of 2,730,408 megawatt-hours and its 2014-2015 biennial conservation target of 485,770 megawatt-hours are approved, subject to the conditions contained within Appendix A attached to this Order and as further clarified in paragraph 16 of this Order.

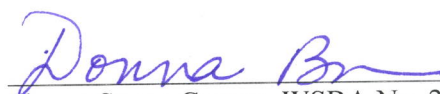
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For the reasons set forth above, PSE respectfully requests that the Commission clarify paragraphs 14 through 16 and paragraph 26 of Order 01.

DATED: December 30, 2013

Respectfully Submitted,

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