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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

UE-031226
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July 28, 2003

VIA HAND DELIVERY & EMAIL

Carole J. Washburn
Office of the Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

**Re: Puget Sound Energy, Inc.
Petition for Exception to WAC 480-107-060 Deadline**

Dear Ms. Washburn:

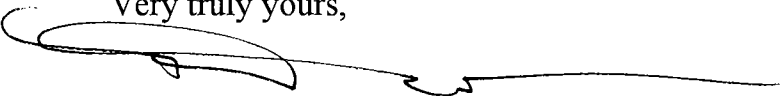
Enclosed for filing are an original and 19 copies of Puget Sound Energy, Inc.'s Petition for Exception to WAC 480-107-060 Deadline. We have provided an electronic copy of this filing via email.

Please note that as of July 28, 2003, my address, telephone, and fax information has changed, as follows:

Kirstin S. Dodge
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Thank you for your assistance.

Very truly yours,



Kirstin S. Dodge

Enclosure

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

PUGET SOUND ENERGY, INC.

For Exception to WAC 480-107-060 Deadline

DOCKET NO. UE-031226

PETITION

INTRODUCTION

1. Puget Sound Energy, Inc. ("PSE" or "the Company") hereby requests that the Commission issue an order granting PSE a four-week extension of the deadline in WAC 480-107-060(2)(a) by which PSE must file a draft request for proposal ("RFP") with the Commission.

2. This Application brings into issue WAC 480-107-060 and 480-107-170(3).

BACKGROUND

3. On April 30, 2003, PSE filed its Least Cost Plan ("LCP") with the Commission, pursuant to WAC 480-90-238 and 480-100-238. Among other things, the LCP finds that PSE has needs for new electric resources over the next several years. *See* LCP, Chapter I at 2-3. Thus, under WAC 480-107-060(2)(a), PSE would normally expect to file a draft RFP with the Commission by July 29, 2003. However, as described below, there are good reasons to temporarily delay PSE's RFP filing.

1 The electric utility shall solicit bids for electric power and electrical
2 savings in conjunction with its least cost planning schedule. The
3 electric utility is required to file its draft request for proposal with the
4 Commission *within ninety days* of the electric utility's filing of its final
5 least cost plan.
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7
8 (Emphasis added). However, WAC 480-107-170(3) provides that the Commission "may
9 grant such exceptions to these rules as may be appropriate in individual cases."
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11 9. The Commission has, historically, granted petitions for waiver of the filing
12 requirements of WAC 480-107-060 in appropriate cases. For example, after Avista filed its
13 April 25, 2001 Least Cost Plan, it requested an extension of time to file an RFP until August
14 30, 2002, 16 months later. The Commission granted that request. *See In the Matter of the*
15 *Petition of Avista Utilities for Waiver of WAC 480-107-060*, Docket No. UE-011438, Order
16 Granting Waiver of Rules (Feb. 12, 2002).
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23 10. In the present case, PSE is only requesting a four-week extension of the time
24 to make its draft RFP filing under the process set forth in WAC 480-107-060. That request is
25 reasonable and consistent with the public interest.
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29 11. As described above, even though PSE has filed its LCP, PSE anticipates that
30 the resource needs to be filled through the RFP filing will change once PSE obtains updated
31 information regarding conservation projections and other models utilized in the LCP. PSE is
32 also considering filing several, coordinated RFPs, and needs additional time to prepare its RFP
33 filing. A temporary delay of PSE's RFP filing under WAC 480-107-060 will not significantly
34 delay the competitive bidding process under WAC 480-107-060 and will place PSE in a better
35 position to acquire the resources actually needed to serve its customers over the next several
36 years.
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REQUESTED ACTION

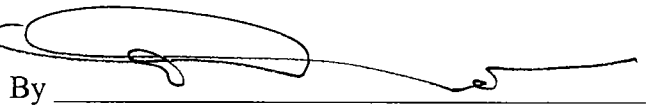
12. For the reasons set forth above, PSE respectfully requests that the Commission issue an order:

A. Granting an exception to the deadline arising from WAC 480-107-060, which requires that PSE file its draft RFP with the Commission by July 29, 2003; and

B. Granting PSE permission to submit its draft RFP filing to the Commission under WAC 480-107-060 no later than August 25, 2003.

DATED: July 28, 2003.

PERKINS COIE LLP

By 

Kirstin S. Dodge
Attorneys for Puget Sound Energy, Inc.