

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

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

In the Matter of the Petition of

PUGET SOUND ENERGY

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

**Docket UE-230810
(consolidated)**

**PUGET SOUND ENERGY’S PETITION
FOR RECONSIDERATION**

I. INTRODUCTION AND RELIEF REQUESTED

1. Pursuant to WAC 480-07-850, Puget Sound Energy (“PSE”) hereby respectfully requests that the Washington Utilities and Transportation Commission (the “Commission”) reconsider Order 09/07 in this proceeding, entered on January 15, 2025 (“Order 09/07”). As an initial matter, PSE expresses its appreciation for the Commission’s recognition in Order 09/07 of PSE’s progress on the clean energy transition and the need to improve PSE’s financial health by incrementally increasing cash flow necessary to operate the utility while balancing

customers' interests. Order 09/07 clearly reflects the Commission's efforts to balance the various interests advocated in this proceeding and to arrive at an outcome that is in the public interest. Notwithstanding the many positive elements of Order 09/07, PSE requests reconsideration of Order 09/07 because

- (1) Order 09/07 appears to have not considered the known and measurable components in the record associated with the operations and maintenance ("O&M") expenses and the reduction adopts a calculation error made by Commission Staff in reducing portions of PSE's O&M expenses and
- (2) Order 09/07 does not materially improve PSE's cash flow due to the denial of certain cash flow positive mechanisms like PSE's proposals to adopt construction work in progress ("CWIP") in rate base and accelerated gas depreciation

Reconsideration of the items discussed below will allow PSE to navigate the clean energy transition with necessary cash flow and continue to provide adequate service to customers while preserving the public interest.

2. Specifically, PSE requests reconsideration of the "Commission Decisions" in paragraphs 250-256 (CWIP in rate base), 337-339 (accelerated depreciation of gas assets), 420-424 (O&M expense), as well as the findings of fact and conclusions of law in paragraphs 514, 515, 539, 542, 588, 593, and 594 of Order 09/07.

II. BACKGROUND

3. Order 09/07 includes meaningful, positive, qualitative, and quantitative components, including establishing a wildfire tracker, providing flexibility in the capital portfolio, allowing for annual power cost updates for the two-year period of this multiyear rate plan, approving an increased return on equity and equity ratio, and allowing a return on certain

power purchase agreements.¹ These components of Order 09/07 will support PSE’s overall financial health and credit profile as it continues to implement the clean energy transition required by the state, as expressly recognized by the Commission in paragraph 108:

some upward adjustment is needed to ensure the Company remains able to provide reliable and adequate service to its customers, continues to meet its statutory obligation to transition to clean energy, per its CETA requirements, and remains credit worthy and able to acquire capital for continued operations. Balancing these competing interests goes to the heart of the Commission’s responsibility.²

4. In Order 09/07, the Commission notes that “approving a higher ROE, capital structure, and resulting ROR allows the Company the opportunity to maintain its credit rating, attract needed capital, continue to be a viable utility providing service to its ratepayers, and continue working toward CETA compliance.”³ As described in the prefiled direct and rebuttal testimonies of Daniel Doyle, Jamie Martin, and Cara Peterman, PSE’s credit metrics have eroded due to the deleterious impact on PSE cash flow resulting from the loss of bonus depreciation since passage of the Tax Cuts and Jobs Act (“TCJA”) in 2017.⁴ PSE’s filing included five elements intended to address declining cash flow:

- 1) an increase in PSE’s authorized return on equity,
- 2) an increase in PSE’s equity ratio, with a hypothetical equity ratio, for ratemaking purposes,
- 3) the inclusion of CWIP in rate base for the Beaver Creek Wind Project and future clean generation projects,

¹ Order 09/07 at ¶¶ 491, 492, 493, 507, 512, 530, 558, 559, 560, 585, and 586.

² Order 09/07 at ¶ 108.

³ Order 09/07 at ¶ 109.

⁴ See Doyle, Exh. DAD-1CT 2:4-10; 20:19-21:15; Peterman, Exh. CGP-1CT 27:4-30:13; Martin, Exh. JLM-1CTr 13:6-17.

- 4) accelerated depreciation of natural gas assets and
- 5) the inclusion of PSE's full weighted average cost of capital return on a certain set of power purchase agreements.

In Order 09/07, the Commission provided needed relief by granting, in part, an increase in the authorized return on equity, an increase in PSE's equity ratio for ratemaking purposes, and the inclusion of a cost of debt return on a certain set of power purchase agreements.

5. Order 09/07, however, accepted a proposal of Commission Staff to disallow amounts in O&M expenses associated with management reserve and reserve contingency. Adoption of Commission Staff's proposal reduced PSE's combined electric and gas O&M expenses by

- 1) \$23.5 million in the first year of the rate period (the sum of \$15.8 million for management reserves and \$7.7 million for reserve contingencies) and
- 2) \$24.2 million in the second year of the rate period (the sum of \$17.3 million for management reserves and \$6.9 million for reserve contingencies).

As discussed in more detail below, PSE updated expenses related to these categories to provide the details associated with the allocation of the amounts prior to the response testimony of Commission Staff questioning these amounts, and PSE demonstrated in its rebuttal testimony these O&M expenses were known and measurable.⁵

6. Additionally, Order 09/07 denied PSE's requests to include CWIP for the Beaver Creek Wind Project in rate base and to accelerate depreciation for natural gas assets, both of which are subjects of this petition.

⁵ See Huizi, Exh. TRH-1T at 12:2-14:6, 16:3-17:17, 18:7-15, 21:11-22:4; Exh. TRH-4; Exh. TRH-5; *see also* Free, Exh. SEF-28T 60:1-61:15.

7. The relief requested in this petition for reconsideration will allow the Commission to “ensure the Company remains able to provide reliable and adequate service to its customers, continues to meet its statutory obligation to transition to clean energy, per its CETA requirements, and remains credit worthy and able to acquire capital for continued operations.”⁶

III. ARGUMENT

8. PSE respectfully requests the Commission reconsider its decision in Order 09/07 regarding O&M expense. Specifically, PSE respectfully requests that the Commission either (i) reinstate the full O&M expense requested by PSE or (ii) recalculate the O&M expense based on the factually correct information. PSE further respectfully requests that the Commission reconsider its position, and change the outcome, with respect to allowing CWIP for the Beaver Creek Wind Project in rate base and allowing accelerated depreciation of natural gas plant.
9. The purpose of a petition for reconsideration is to request that the Commission change the outcome with respect to one or more determinations in a final order,⁷ and the petition must identify each portion of the order that is erroneous or incomplete.⁸ The Commission may reconsider a final order when it did not consider the relevant evidence or otherwise committed an error of law.⁹

⁶ Order 09/07 at ¶ 108.

⁷ WAC 480-07-850(1)(a).

⁸ WAC 480-07-850(1)(b)(i).

⁹ *WUTC v. Avista*, Docket UE-160228, Order No. 07 (Feb. 27, 2017).

A. The Commission's Decision To Disallow Certain O&M Expenses Should Be Reconsidered.

10. PSE respectfully requests the Commission reconsider its decision to disallow certain O&M expenses for two reasons: 1) the pro forma adjustments are known and measurable and recovery of these expenses is consistent with prior Commission decisions, and 2) the Commission Staff recommendation on which the Commission relied represents incomplete information and an inaccurate calculation.

1. The O&M Pro Forma Adjustments are Known and Measurable and Recovery is Consistent With Prior Commission Decisions

11. In Order 09/07, the Commission directed PSE as follows:

In future filings, the company should be prepared to explain not only its process of allocating its board approved budget to specific projects and programs, but also propose an appropriate methodology to reasonably and thoroughly review and evaluate the forecasted expenses including possible alternatives to pro forma adjustment.¹⁰

PSE fully commits to complying with the Commission's direction with rigor and transparency in future filings. Indeed, PSE did include in the record extensive details regarding the allocation of expenses of board approved budget to specific projects.¹¹ The Commission's decision to adopt Commission Staff's recommendation to disallow portions of O&M expense in Order 09/07, however, is not based on an accurate or complete reflection of the record evidence in this proceeding.

¹⁰ Order 09/07 at ¶ 424.

¹¹ See Huizi, Exhs. TRH-3 – TRH-5. PSE provided this information in native Excel, and in the future will provide this information in a more consolidated format in addition to the native Excel.

12. Order 09/07 does not appear to fully consider or reflect the re-allocated budget information that PSE provided in response to Commission Staff Data Request No. 149,¹² and the Prefiled Rebuttal Testimony of Theresa R. Huizi.¹³ The information that PSE provided in its response to Commission Staff Data Request No. 149, Exh. TRH-5, reflects the culmination of PSE's budget process and was an important part of the evidence PSE included in the record. The O&M expense requested at the time of filing, net of management reserves and reserve contingencies, is exactly the same amount as reflected in Exh. TRH-5 post reallocation. PSE's post filing refinements did not change its total request; instead, it provided known and measurable details as articulated in PSE's June 2024 response to Commission Staff Data Request No. 149, which was provided well before Commission Staff's response testimony was due in the case.
13. PSE's Response to Commission Staff Data Request No. 149, provided in Exh. TRH-4 and Exh. TRH-5, illustrates that the management reserves and reserve contingencies that existed in PSE's budget at the time of its direct filing had been allocated to meet the known and measurable standard, with only minor immaterial levels unallocated, specifically, \$1.1 million in the first year of the rate period and \$.4 million in the second year of the rate period.¹⁴ Commission Staff did not accurately address, or appears to have ignored, the updated information provided by PSE in response to Commission Staff Data Request No. 149, Exh. TRH-5, in response testimony; nonetheless, PSE did include the updated

¹² See Huizi, Exh. TRH-5.

¹³ See Huizi, Exh. TRH-1T at 22, Table 1, line 8, columns C and E.

¹⁴ See Huizi, Exh. TRH-1T at 22, Table 1, line 8, columns C and F (demonstrating the allocation of management reserves and reserve contingencies to known projects for the first and second years of the rate period, respectively).

information in its rebuttal testimony.¹⁵ In summary, these O&M pro forma adjustments meet the known and measurable standard that the Commission cited in its Order 09/07.

14. The Commission has allowed updates to pro forma adjustments, including O&M expense, during the pendency of rate proceedings, when those updated expenses are known and measurable.¹⁶ In a multiyear rate plan, updates to O&M expense can and should be expected. As the testimony of Theresa Huizi shows, the expenses the Commission disallowed were known and measurable before response testimony, before the hearing, and before the beginning of the rate years in this case. Because the O&M expenses at issue were fully known, measurable, and allocated to actual projects more than six months before the start of the rate year, they are consistent with the Commission's interpretation of its known and measurable standard for pro forma adjustments and should be allowed. PSE respectfully requests the Commission recognize these updates to pro forma adjustments in its reconsideration and allow PSE to recover its requested O&M expense.

15. As demonstrated in the rebuttal testimony of Theresa Huizi, the O&M dollars in management reserve and reserve contingency were fully allocated in the 2025 and 2026 budgets. If those dollars are not restored in rates, PSE will cut spending across multiple programs. As documented in the prefiled rebuttal testimony of Jamie L. Martin, as a first

¹⁵ See *id.*; see also Huizi, Exh. TRH-4, and Huizi, Exh. TRH-5.

¹⁶ See, e.g., *WUTC v. Cascade Natural Gas*, UG-200568, Order 05 ¶ 202 (May 18, 2021) (granting adjustment to O&M expenses where the rebuttal testimony updated expenses that were known and measurable); *WUTC v. PacifiCorp*, Docket UE-130043 Order 05 ¶¶ 188-202 (December 4, 2013) (rejecting as too rigid Staff's and Public Counsel's proposed bright line cut-off dates for known and measurable additions—date of filing or six weeks after date of filing—and instead allowing recovery of plant and O&M pro forma adjustments that were known and measurable several months after filing case and that were updated on rebuttal)

area of focus for reductions, PSE will significantly scale back its work associated with the Clean Energy Implementation Program.¹⁷ Even with these cuts, PSE will need to make further cuts in other areas to fully mitigate the impact of the O&M reduction in Order 09/07.¹⁸

2. The Commission Relied on Staff's Presentation of Incomplete Information and Inaccurate Calculations in Reaching its Decision

16. In Order 09/07, the Commission cites an incorrect amount of O&M expenses—\$65 million in management reserves—that Commission Staff claims the Commission would be justified in removing from PSE's O&M expenses.¹⁹ This number cited by Commission Staff is erroneous. In its rebuttal testimony, PSE states, "[t]he Commission should not be distracted by the erroneous reference to management reserves of \$65 million, which were extracted by [staff] from the wrong tabs within Exh. TRH-3."²⁰ Importantly, these were not used in the development of PSE's O&M request in this proceeding.²¹ The Commission should not accept Staff's attempt to make the O&M reductions appear more reasonable and palatable by referencing this incorrect amount.
17. If the Commission were to desire to remove management reserves, it should consider all management reserve line items together, which total \$4.5 million, to understand the full extent of management reserves. Lines 1 through 8 of Table 1 below, which is extracted from

¹⁷ See Martin, Exh JLM-1CTr at 44.

¹⁸ *Id.*

¹⁹ See Order 09/07 at ¶¶ 413, 414, 419.

²⁰ See Huizi, Exh. TRH-1T at 21:2-6.

²¹ See Huizi, Exh. TRH-1T at 19:16 to 21:10.

Exh. TRH-3, show the proper calculation of management reserves. All of these line items are management reserves. When taken in totality, specifically line 8, column D, shows that the management reserves included in PSE's O&M request for 2025 and 2026 totaled a net \$4.5 million or 0.25% of total O&M expense²² comprised of (\$31.8) million for 2025 and \$36.3 million for 2026.²³ As Ms. Huizi testified, management reserves can be positive or negative.²⁴ Negative amounts indicate that the reserves have been over allocated, as was the case for the 2025 rate year at the time of the initial filing. As shown in the table below, Staff incorrectly selected a single component of management reserves rather than looking at the totality of management reserves.

Table 1²⁵

(A)		(B)	(C)	(D)
Line	WBS Element & Description Data as Submitted (\$ millions)	2025	2026	Total
1	W_C.99999.03.33.02 - Management Reserve & Corporate ContingenA_63300070 - Planning - Miscellaneous Expense	-	-	-
2	W_C.99999.03.33.02 - Management Reserve & Corporate ContingenA_63300140 - Planning - Outside Services Legal	(37.1)	21.1	(16.0)
3	W_C.99999.03.33.02 - Management Reserve & Corporate ContingenA_63300150 - Planning - Outside Services Other (Line 14 below)	15.8	17.3	33.1
4	W_C.99999.03.33.03 - Enterprise Risk Tracking OMA_63300152 - Planning - Outside Services-Service Prov	5.3	15.2	4.5
5	W_C.99999.03.33.03 - Enterprise Risk Tracking OMA_63300150 - Planning - Outside Services Other	(17.7)	(19.3)	(0.6)
6	W_C.99999.03.33.03 - Enterprise Risk Tracking OMA_63300100 - Planning - Payroll Taxes OH	(0.3)	(0.3)	(37.0)
7	W_C.99999.03.33.03 - Enterprise Risk Tracking OMA_63300080 - Planning - Benefits OH	2.2	2.3	20.5
8	Management Reserve Subtotal	(31.8)	36.3	4.5
9				
10	W_K.99999.03.49.03 - CETA Administration CEIPA_63300193 - Planning - Reserve Contingency (Line 15 below)	7.7	6.9	14.6
11	Management Reserve & Reserve Contingency Total	(24.1)	43.1	19.0
12				
13	Staff Proposed Adjustment	2025	2026	Total
14	Management Reserve (Line 3 above)	15.8	17.3	33.1
15	Reserve Contingency (Line 10 above)	7.7	6.9	14.6
16	Management Reserve & Reserve Contingency Total	23.5	24.2	47.7

18. If calculated correctly, considering the total amount of management reserves, the upper limit of what the Commission could disallow specific to management reserves and reserve

²² See Huizi, Exh. TRH-1T at 22:12.

²³ See Huizi, Exh. TRH-1T at 22:3, Table 1 line 8, columns D and F, respectively.

²⁴ See Huizi, Exh. TRH-1T at 22:1-2, see also Exh. TRH-1T 21:11-22:1.

²⁵ The dollar figures for this table are extracted from Exh. TRH-3, Tab "Total O&M Plan Data Table" which is the original source document for Staff; Lines 14 and 15 are from Exh. CRM-1Tr at 120:16-21, 121:12-16.

contingencies combined is \$19 million, rather than the Staff's \$47.7 million disallowance, based on the February 15, 2024 direct filing.²⁶ The inclusion of Staff's inaccurate calculation in Order 09/07 means all the evidence in the case was not shown to be considered. Accordingly, PSE respectfully requests that if the Commission were to reduce O&M expense, it reconsider the amount of the reduction based on the complete and correct calculation (i.e., \$19 million).

B. Improved Cash Flow Is Important for PSE's Continued Ability To Invest in Clean Energy, System Safety and System Reliability on behalf of Customers.

19. While Order 09/07 does result in some improvement to cash flow, these improvements are modest. The evidentiary record demonstrated substantial improvement in cash flow was necessary. As seen below, Order 09/07 results in a \$20 million increase in cash flow in 2025 and a \$36 million increase in cash flow in 2026, which is approximately 15 percent and 25 percent of PSE's request, respectively.

²⁶ Please see Table 1 above, specifically line 11, column D.

Table 2

Cash Flow Change between Filed Testimony and WUTC Order						
	<u>PSE Filed Request</u>		<u>Order</u>		<u>Reduction in Cash Flow from Request</u>	
	<u>2025</u>	<u>2026</u>	<u>2025</u>	<u>2026</u>	<u>2025</u>	<u>2026</u>
Accelerated Gas Depreciation	\$70	\$67	\$0	\$0	(\$70)	(\$67)
CWIP	\$22	(\$3)	\$0	\$0	(\$22)	\$3
Equity Ratio	\$9	\$22	\$0	\$11	(\$9)	(\$10)
ROE	\$26	\$56	\$18	\$24	(\$7)	(\$32)
PPA	\$2	\$2	\$1	\$1	(\$1)	(\$1)
Total	\$129	\$143	\$20	\$36	(\$109)	(\$106)
Percent of Total Request			15%	25%		

The concern with the Commission’s decision (as detailed in the table above), as PSE articulated in the testimony of Cara Peterman and Daniel Doyle, is that substantial capital investments are required in the coming years, and a healthy financial profile is critical to attracting capital at reasonable rates for the benefit of customers.²⁷ To address the continued gap in cash flow, PSE requests that the Commission reconsider Order 09/07 and allow PSE to further improve its cash flow, specifically through accelerated depreciation of natural gas assets and including CWIP in rate base treatment for the Beaver Creek Wind Project. This will enhance PSE’s ability to attract capital at reasonable rates for customer-benefiting system and clean energy investments.

20. PSE’s request for reconsideration of these two mechanisms (CWIP in rate base treatment for the Beaver Creek Wind Project and accelerated depreciation of natural gas plant) is consistent with the Commission’s recognition that adjustment is needed “to ensure the Company remains able to provide reliable and adequate service to its customers, continues to

²⁷ See Doyle, Exh. DAD-1CT at 22:1-23:21; Peterman, Exh. CGP-1CT at 19:18-21:16.

meet its statutory obligation to transition to clean energy per its CETA requirements, and remains credit worthy and able to acquire capital for continued operations.”²⁸ It is further consistent with the Commission’s determination that Order 09/07 is intended to “allow[] the Company the opportunity to maintain its credit rating, attract needed capital, continue to be a viable utility providing service to its ratepayers, and continue working toward CETA compliance.”²⁹

1. The Commission Should Authorize CWIP for the Beaver Creek Wind Project in Rate Base

21. As the Commission recognizes in its decision, “the Commission is authorized to allow CWIP in rate base and has done so in the past”.³⁰ The Commission goes on to say, “[t]he Beaver Creek Wind Project is nearing completion, and thus is not a good candidate for application of CWIP in rate base.”³¹ Order 09/07 notes that PSE provided analysis to show that CWIP in rate base treatment for the Beaver Creek Wind Project proposed in this case was less costly to customers than traditional AFUDC treatment.³² This, along with the increased cash flow that CWIP in rate base treatment will provide to further the transition to clean energy, demonstrates that CWIP in rate base is consistent with the public interest and should be granted.³³

²⁸ Order 09/07 at ¶ 108.

²⁹ Order 09/07 at ¶ 109.

³⁰ Order 09/07 at ¶ 252.

³¹ *Id.*

³² Order 09/07 at ¶ 224, 227.

³³ See RCW 80.04.250(2) (allowing recovery of CWIP in rate base to the extent it is in the public interest and will yield fair, just, reasonable, and sufficient rates).

2. The Commission Has Authority To Set Depreciation Rates and Should Authorize Accelerated Gas Depreciation as Proposed by PSE

22. The Commission should reconsider its decision and approve PSE's accelerated gas depreciation proposal because it is consistent with the public interest. PSE proposed a gradual increase in gas depreciation rates consistent with gradualism principles and to avoid future inequitable financial burdens for natural gas customers.³⁴ PSE's accelerated gas depreciation proposal is fully explained in the testimony of Ned W. Allis.³⁵ The use of accelerated gas depreciation as a tool to enhance cash flow is discussed in the rebuttal testimony of Jamie Martin and Matt Steuerwalt.³⁶ In Order 09/07, the Commission found PSE's accelerated gas depreciation proposal persuasive, in part,³⁷ and the Commission also recognized it has discretion in setting depreciation rates.³⁸ Further, the Commission determined that its power to set depreciation rates has not been eliminated by the passage of Ballot Initiative 2066. The Commission correctly stated that "the repeal of the affirmative requirement to propose and approve accelerated depreciation is not tantamount to a limitation of the Commission's general authority to set rates, which includes the ability to approve accelerated depreciation."³⁹ Despite this, the Commission concludes that it is best to pause consideration of the topic at this time.⁴⁰ In light of the Commission's determination that Order 09/07 is intended to improve PSE's cash flow and allow PSE "the opportunity to

³⁴ See Allis, Exh. NWA-1T at 30:1-16, Exh. NWA-4T at 4:6-12.

³⁵ See Allis, Exh. NWA-1T at 28:12-30:16; Exh. NWA-4T at 4:2-5:23.

³⁶ See Martin, Exh. JLM-1CTr at 67:6-69:3; Steuerwalt, Exh. MS-4T at 17:8-12.

³⁷ Order 09/07 at ¶ 337.

³⁸ Order 09/07 at ¶ 338.

³⁹ *Id.*

⁴⁰ Order 09/07 at ¶ 337.

maintain its credit rating, attract needed capital, continue to be a viable utility providing service to its ratepayers, and continue working toward CETA compliance,”⁴¹ PSE respectfully requests the Commission reconsider its decision and approve PSE’s accelerated gas depreciation proposal, which is consistent with the Commission’s overall intention in this case.

23. PSE will thoughtfully address the Commission’s directive “to examine the impacts and cost burden analysis for expedited natural gas asset depreciation on Named Communities and overburdened customers by January 2027 and incorporate these findings into the first Integrated System Plan.”⁴² However, in the interim, PSE has ample programs available to assist customers with their energy bills, ensuring that customers who are most in need are supported.⁴³ The evidence in the record demonstrates that PSE HELP and the Bill Discount Rate, combined, reduce customers’ energy burden to an average of two percent or less for most low income and estimated low-income customers.⁴⁴
24. PSE respectfully requests that the Commission reconsider its decision and allow CWIP for the Beaver Creek Wind Project in rate base and grant accelerated depreciation for natural gas assets as proposed by PSE.

IV. CONCLUSION

25. The Commission has made clear that Order 09/07 is intended to allow PSE to “maintain its credit rating, attract needed capital, continue to be a viable utility providing service to its

⁴¹ Order 09/07 at ¶ 109.

⁴² Order 09/07 at ¶ 339.

⁴³ See Jhaveri, Exh. BDJ-1T at 34:7-36:16.

⁴⁴ See Wallace, Exh. CLW-1T at 10:15-11:4.

ratepayers, and continue working toward CETA compliance.”⁴⁵ In order to meet the Commission’s stated goals, PSE respectfully requests the Commission reconsider its order with respect to O&M expense and allow recovery of the amounts requested by PSE. PSE further requests that the Commission reconsider its decision in Order 09/07 and allow PSE to utilize CWIP in rate base treatment for the Beaver Creek Wind Project, and authorize accelerated depreciation of PSE’s natural gas plant as proposed by PSE. Reconsideration of these items will allow the Commission to achieve its intended public interest in this proceeding.

RESPECTFULLY SUBMITTED this 24th day of January, 2025.

PERKINS COIE LLP

By s/ Sheree Strom Carson

Sheree Strom Carson, WSBA #25349

Donna L. Barnett, WSBA #36794

Pamela J. Anderson, WSBA #37272

David S. Steele, WSBA #45640

Byron C. Starkey, WSBA #55545

Attorneys for Puget Sound Energy

⁴⁵ Order 09/07 at ¶ 109.