

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	Docket UE-240004
)	Docket UG-240005
PUGET SOUND ENERGY)	
)	PETITION OF
For an Order Authorizing Deferred Accounting)	PUGET SOUND ENERGY
to Allow Tracking of the Revenue Requirement)	
Associated with Puget Sound Energy's Petition)	
for Reconsideration in UE-240004/UG-240005)	

I. INTRODUCTION

1. In accordance with WAC 480-07-370(3) and 480-07-850, Puget Sound Energy ("PSE" or "Company") respectfully petitions the Washington Utilities and Transportation Commission ("Commission") for an Order authorizing the deferred accounting detailed in this Petition related to the revenue requirement associated with PSE's Petition for Reconsideration in Dockets UE-240004/UG-240005.
2. Statutes and rules at issue in this Petition include RCW 80.01.040, RCW 80.28.020, WAC 480-90-203, WAC 480-100-203 and WAC 480-07-370.
3. PSE is a combined gas and electric utility that provides service to approximately 1,200,000 electric customers and 860,000 natural gas customers in Western Washington.
4. All correspondence related to this Petition should be directed as follows:

Puget Sound Energy
Attn: Susan Free
Director of Revenue Requirements and Regulatory Compliance
P.O. Box 97034, BEL10W
Bellevue, WA 98009-9734

II. BACKGROUND

5. On February 15, 2024, PSE filed with the Commission its general rate case in consolidated Dockets UE-240004/UG-240005 and UE-230810. At the end of the procedural calendar, on January 15, 2025, the Commission issued Order 09/07, (“Final Order”), rejecting PSE’s proposed tariff revisions, authorizing and requiring PSE to make compliance filings in this docket.
6. On January 21, 2025, PSE filed its Compliance Filing with updated tariffs that the Commission approved on January 28, 2025 with an effective date of January 29, 2025.
7. On January 24, 2025, PSE filed a Petition for Reconsideration in this docket (“Reconsideration Petition”). PSE’s Reconsideration Petition requests that the Commission reconsider three issues related to the Final Order. Specifically, PSE requested reconsideration of the Commission’s decisions regarding rate base treatment for constructions work in progress¹, treatment of accelerated gas depreciation² and treatment of operating and maintenance expenses.³
8. Should the Commission accept any part of PSE’s Reconsideration Petition, this Accounting Petition will allow the Commission to correct PSE’s rates back to the date that rates were put into effect on January 29, 2025.
9. This petition requests the Commission for an Accounting Order, granting the Company the ability to defer the difference between PSE’s rates that became effective January 29,

¹ Final Order ¶¶ 337-339

² *Id.* ¶¶ 420-424

³ *Id.* ¶¶ 514, 515, 539, 542, 588, 593, and 594

2025 and the rates that would have become effective on that date based on the Commission's final decision on PSE's Reconsideration Petition.

III. PROPOSED ACCOUNTING TREATMENT

10. PSE proposes that it be allowed to track the amount of revenue it would have received if rates had been set based on the final outcome of PSE's Reconsideration Petition. As recovery is not certain, PSE will initially record these entries as a debit to FERC 186 Miscellaneous Deferred Debits with an offsetting contra entry also to FERC 186.
11. The amount of the monthly entry will be calculated as the difference between the rate schedule revenues that result from rates that became effective on January 29, 2025, and the rate schedule revenues that would have resulted if rates had been set based on the final outcome of PSE's Reconsideration Petition, adjusted for load and customer counts.
12. In the event that the Commission's final decision is to grant all or part of PSE's Reconsideration Petition, PSE will transfer the appropriate amount accumulated to date in the offsetting contra FERC 186 account to a FERC 456 and 495 account for electric and gas, respectively. PSE will also continue recording future amounts as a debit to the FERC 186 account and a credit to FERC 456 and FERC 495 until the Commission determines if recovery of the amounts is warranted and a rate is set to recover the deferral.
13. In the event that the Commission's final decision is to not grant any of PSE's Reconsideration Petition, PSE will dissolve the entries and no further accounting or rate requests will be pursued.

IV. REQUEST FOR RELIEF

14. For the reasons discussed above, PSE respectfully requests the Commission issue an Amended Order approving the deferred accounting as set forth in this Petition.

DATED this 29th day of January, 2025

Puget Sound Energy

By /s/ Susan E. Free

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