



# PUGET SOUND ENERGY

*The Energy To Do Great Things*

Puget Sound Energy, Inc.  
P.O. Box 97034  
Bellevue, WA 98009-9734

August 15, 2014

***Filed Via Web Portal***

Mr. Steven King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**Re: Docket No. UE-132032 (Advice No. 2013-26)**

Dear Mr. King:

Puget Sound Energy, Inc. ("PSE") respectfully requests to withdraw the proposed revisions to its tariff, WN U-60, Tariff G, Sheet 292-A, First Revision, filed on November 1, 2013, in Docket No. UE-132032 which would have allowed for recovery of costs for Conservation Voltage Regulation ("CVR")<sup>1</sup> and phase balancing associated with CVR through Schedule 120. The Commission suspended this tariff revision on December 19, 2013, in Order 01, Order Approving Puget Sound Energy's 2014-2023 Achievable Conservation Potential and its 2014-2015 Biennial Conservation Target Subject to Conditions. On April 24, 2014, the Commission approved a motion to allow the Commission Secretary to accept PSE's withdrawal of this proposed revised tariff sheet.

PSE is withdrawing this tariff sheets because the costs for CVR and phase balancing associated with CVR have not been included in PSE's conservation budget in the current biennium. Although the Commission did not authorize recovery in PSE's current conservation budget, there remains a dispute between interested stakeholders as to whether the incremental costs of phase balancing associated with CVR should be recoverable through PSE's conservation rider, and the Commission has not decided this issue on the merits. Therefore, PSE reserves the right to raise this issue in future biennia.

As stated in PSE's earlier filings in this docket, there is no dispute that CVR meets the statutory definition of conservation set forth in RCW 19.285.030(6), which defines conservation as "any reduction in electric power consumption resulting from increases in the efficiency of energy use, production, or distribution." CVR and phase balancing are distribution efficiencies undertaken

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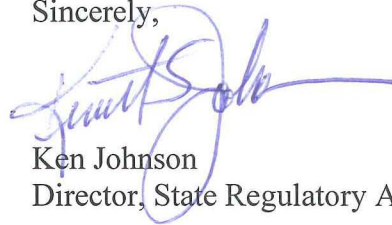
<sup>1</sup> Also referred to at times by parties as "Conservation Voltage Reduction."

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by the utility designed to reduce customers' electric power consumption. By undertaking distribution efficiencies such as phase balancing, PSE opens up opportunities for conservation for its customers. But for the conservation benefits that result from this phase balancing, PSE would not undertake the level of phase balancing it proposed in this biennium.

In accordance with WAC 480-80-131(6), the request to withdraw the tariff sheet described herein is being made by Ken Johnson who has authority to withdraw the filing on behalf of the Company.

Sincerely,



Ken Johnson  
Director, State Regulatory Affairs

cc.: Simon J. ffitch, Public Counsel  
Deborah Reynolds, Assistant Director - Conservation and Energy Planning  
Sheree Carson, Perkins Coie