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**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PUGET SOUND ENERGY, INC.

Petition for Approval of a Power Purchase Agreement for Acquisition of Coal Transition Power, as Defined in RCW 80.80.010, and the Recovery of Related Acquisition Costs

Docket No. UE-12_____

Puget Sound Energy, Inc.’s
Motion to Expedite
Consideration of Petition

1. Puget Sound Energy, Inc. (“PSE”) files this motion to expedite the Commission’s consideration of PSE’s Petition for Approval (“Petition”) of a Power Purchase Agreement for Acquisition of Coal Transition Power (“Coal Transition PPA”), filed herewith. PSE respectfully requests that the Commission issue a final order in this proceeding no later than December 15, 2012. In support for this motion to expedite, PSE relies on its Petition and the prefiled direct evidence filed in support of PSE’s Petition.

2. On April 29, 2011, Governor Gregoire signed Engrossed Second Substitute Senate Bill 5769 (“Coal Transition Energy Bill”), which provides certain deferrals of Washington’s greenhouse gas emissions performance standard to encourage the early closure of coal plants in Washington. The Coal Transition Energy Bill amended the emissions performance standard to allow coal-fired baseload facilities in Washington, such as TransAlta Centralia’s Centralia Transition Coal Facility, to comply with greenhouse gas

Puget Sound Energy, Inc.’s
Motion to Expedite
Consideration of Petition – 1

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1 emissions performance standards by shutting down one of its two boilers by the end of 2020
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3 and the other by the end of 2025. The Coal Transition Energy Bill addressed the technology
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5 that the Centralia Transition Coal Facility would implement for control of certain
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7 greenhouse gas emissions. It also removed limitations on long-term sale of the output of
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9 such coal-fired facilities until the deadline and established a process that allows electric
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11 utilities to petition this Commission for approval of a power purchase agreement for coal
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13 transition power.
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17 3. On December 23, 2011, Governor Gregoire and TransAlta Centralia entered
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19 into a Memorandum of Agreement, which confirmed the arrangements set forth in the Coal
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21 Transition Energy Bill in contractual form. The Memorandum of Agreement between
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23 TransAlta Centralia and the State of Washington is effective as of April 1, 2012, and expires
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25 no earlier than December 31, 2025, unless terminated earlier pursuant to its terms.
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27 TransAlta Centralia may terminate the Memorandum of Agreement with the State of
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29 Washington if, as of December 15, 2012, TransAlta Centralia or an affiliate has failed,
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31 despite the exercise of its commercially reasonable efforts, to negotiate and execute one or
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33 more power purchase agreements.
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37 4. PSE and TransAlta executed such a power purchase agreement (“Coal
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39 Transition PPA”), and a copy of the Coal Transition PPA is filed in this proceeding as the
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41 Second Exhibit to the Prefiled Direct Testimony of Roger Garratt, Exhibit No. ____ (RG-3C).
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43 The Commission should grant PSE’s Motion to Expedite so that PSE can adequately plan to
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45 meet future capacity need. As demonstrated in the testimony and exhibits filed in this
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1 proceeding, PSE has an existing and growing capacity need. The Coal Transition PPA helps
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3 PSE to meet this growing capacity need in December 2014. All of the evidence necessary to
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5 approve and issue a prudence determination regarding the Coal Transition PPA exists, and
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7 there is no need for delay. Indeed, quick resolution of the uncertainty regarding the status of
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9 the Coal Transition PPA will facilitate PSE's efforts in projecting and meeting its capacity
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11 needs during the term of the Coal Transition PPA. Furthermore, TransAlta Centralia would
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13 like to know as soon as possible whether the Coal Transition PPA will go into effect so that
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15 it can proceed with plans to market its power.
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19 5. For the foregoing reasons, PSE respectfully requests that the Commission
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21 grant PSE's motion to expedite consideration of its Petition and issue a final order in this
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23 proceeding no later than December 15, 2012.
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Dated this 20th day of August, 2012

PERKINS COIE LLP

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