



UE-220066

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Public Counsel

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July 31, 2024

SENT VIA E-SERVICE

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P.O. Box 47250
Olympia, WA 98503-7250

**Re: *Wash. Utils. And Transp. Comm'n v. Puget Sound Energy*
Dockets UE-220066, UG-220067 & UG-201918, Comments of Public Counsel**

Dear Mr. Killip:

On December 12, 2022, the Washington Utilities and Transportation Commission (Commission) entered Order 24 in the above-referenced docket, which required Puget Sound Energy (PSE) to file an annual report of PSE's actual 2023 investments compared to what was used to set rates for the first year of the multiyear rate plan. On March 29, 2024, PSE timely filed its capital report in accordance with Order 24.

Public Counsel reviewed the compliance filing. At this time, Public Counsel takes no position at this time regarding the inclusion of the provisional capital projects from the 2022 GRC in the first year of the rate plan. Public Counsel reserves the right to challenge the prudence of any capital projects in future filings. Public Counsel recommends that the Commission provide additional guidance as to what extent PSE needs to support deviations from the initial GRC filing and actual plant in service for the rate year, including but not limited to business cases.

Sincerely,

s/ Tad Robinson O'Neill

TAD ROBINSON O'NEILL, WSBA No. 37153

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CERTIFICATE OF SERVICE

**DOCKETS UE-220066, UG-220067, and UG-210918 (Consolidated)
Washington Utilities & Transportation Commission v. Puget Sound Energy**

I HEREBY CERTIFY that I have this day served *Capital Review Response Letter* on behalf of Public Counsel upon all parties of record in this proceeding, by electronic transmission to the email address(es) or by mailing a true and correct copy, postage prepaid, to each party or party representative listed in the Commission's master service list for this docket.

<p>COMMISSION STAFF:</p> <p>Jeff Roberson Nash Callaghan Office of the Attorney General Utilities & Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 jeff.roberson@utc.wa.gov nash.callaghan@atg.wa.gov</p> <p>Betsy DeMarco, elizabeth.demarco@atg.wa.gov Jeanne Roth, jeanne.roth@atg.wa.gov</p>	<p>PUGET SOUND ENERGY:</p> <p>Sheree Strom Carson Pamela Anderson Donna L. Barnett David S. Steele Ryan C. Thomas Byron C. Starkey Perkins Coie LLP 10885 NE Fourth Street, Suite 700 Bellevue, WA 98004-5579 scarson@perkinscoie.com pjanderson@perkinscoie.com dbarnett@perkinscoie.com dsteele@perkinscoie.com rthomas@perkinscoie.com byronstarkey@perkinscoie.com</p> <p>Rick Rasmussen, rrasmussen@perkinscoie.com</p>
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Dated at Seattle, Washington this 31st day of July 2024.

s/ Grace Monastrial

GRACE MONASTIAL
Paralegal 2 Supervisor

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