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**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

Docket No. UG-15_____

PUGET SOUND ENERGY, INC.

Declaration of Roger Garratt in Support
of PSE's Motion for Amended Protective
Order With Highly Confidential Provisions

for (i) Approval of a Special Contract for
Liquefied Natural Gas Fuel Service with
Totem Ocean Trailer Express, Inc. and
(ii) a Declaratory Order Approving the
Methodology for Allocating Costs
Between Regulated and Non-regulated
Liquefied Natural Gas Services

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1. I, ROGER GARRATT, hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

2. I am the Director of Strategic Initiatives for Puget Sound Energy, Inc. ("PSE"). My present responsibilities include oversight of: (i) the acquisition and development of electric resources for PSE; (ii) contracts for long-term electric supply; and (iii) PSE's emerging technology investigations and strategies.

3. I have personal knowledge of the matters set forth in this Declaration and, as to matters that call for an opinion, state such opinion on information and belief based on my experience in the industry and with PSE.

4. PSE is requesting a protective order with "highly confidential" provisions to protect certain material contained in its petition for approval, filed August 11, 2015, of a

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Perkins Coie LLP
The PSE Building
10885 N.E. Fourth Street, Suite 700
Bellevue, WA 98004-5579
Phone: 425.635.1400
Fax: 425.635.2400

1 special contract with Totem Ocean Trailer Express, Inc. (“TOTE”) for the supply of
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3 liquefied natural gas (“LNG”) as a marine fuel (the “TOTE Special Contract”), and a
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5 declaratory order approving the methodology for allocating costs between regulated and
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7 non-regulated LNG gas services to be provided by PSE’s proposed Tacoma LNG Facility
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9 (the “2015 LNG Petition”), because inappropriate release of that material would impose a
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11 highly significant risk of competitive harm to TOTE and to PSE.
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15 5. PSE marked information contained on a number of pages of prefiled direct
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17 testimonies and exhibits in support of 2015 LNG Petition as “confidential” or “highly
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19 confidential”. The Commission’s standard form of protective order should be sufficient to
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21 protect the materials in PSE’s filing that have been marked “confidential.” Such materials
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23 include costs associated with the development and construction of PSE’s proposed Tacoma
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25 LNG Facility. The Commission’s standard protective order prohibits the use of such
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27 information outside the scope of a particular proceeding.
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31 6. By contrast, the material that PSE has marked “highly confidential” requires
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33 enhanced protections from disclosure. The information that PSE has marked “highly
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35 confidential” is highly sensitive commercial information related to the TOTE Special
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37 Contract negotiated between PSE and TOTE. This information, if released to current or
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39 potential suppliers or purchasers of LNG for vehicular fuel or industrial end uses, could
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41 cause significant competitive harm to TOTE in its efforts to obtain LNG fuel supply in other
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43 jurisdictions. Additionally, PSE has marked as “highly confidential” certain studies
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45 commissioned by PSE with respect to (a) the projected price spreads between ultra-low-
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1 sulfur diesel and intermediate fuel oil 380 and Sumas natural gas prices and (b) market
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3 assessments for several potential LNG markets, including heavy-duty on-road
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5 transportation, and marine, rail, and industrial conversion markets. This information, if
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7 released to current or potential suppliers or purchasers of LNG for vehicular fuel or
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9 industrial end uses, could cause significant competitive harm to PSE as it markets non-
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11 regulated fuel sales to customers other than TOTE.
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15 7. PSE respects the concerns that have been expressed by other parties
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17 that the “highly confidential” designation should not be applied lightly. PSE has been
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19 careful in its 2015 LNG Petition filing to minimize the amount of information designated
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21 “highly confidential.” For example, PSE is not seeking highly confidential treatment of any
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23 information that does not relate to (i) the TOTE Special Contract or (ii) studies
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25 commissioned by PSE with respect to (a) the projected price spreads between ultra-low-
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27 sulfur diesel and intermediate fuel oil 380 and Sumas natural gas prices and (b) market
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29 assessments for several potential LNG markets, including heavy-duty on-road
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31 transportation, and marine, rail, and industrial conversion markets. PSE is making the
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33 projected budget of the Tacoma LNG Project, which consists of the Tacoma LNG Facility
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35 and associated upgrades to its natural gas distribution system, public. PSE has marked
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37 detailed budget projection information confidential (but not highly confidential). Taken all
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39 together, PSE believes that the public can understand and other parties can productively
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41 participate in the 2015 LNG Petition without access to the “highly confidential” information.
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Declaration of Roger Garratt in Support
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1 8. For these reasons, PSE requests that the Commission issue a protective order
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3 with “highly confidential” provisions that permits PSE to designate information as “highly
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5 confidential” in its testimony, exhibits, workpapers, responses to data requests, briefing and
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7 in hearings. PSE is also asking that only the Commission Staff and Public Counsel have
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9 access to such “highly confidential” information. Any further release to experts for
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11 Commission Staff or Public Counsel, or to any other parties who intervene in the 2015 LNG
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13 Petition filing, should be subject to a showing that such persons or entities are not current or
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15 potential suppliers or purchasers of LNG for vehicular fuel or industrial end uses or
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17 consultants or advisors to such suppliers or purchasers.
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21 9. Finally, with respect to treatment of “highly confidential” material, PSE is
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23 asking for limitations on copying and handling of such materials by parties who are entitled
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25 to access such materials in order to reduce the risk of inadvertent disclosure.
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28 Executed this 11th day of August, 2015, at Bellevue, Washington.
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Roger Garratt

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