

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

PUGET SOUND ENERGY

For Approval of its April 2019 Power Cost
Adjustment Mechanism Report

DOCKET UE-190324

COMMISSION STAFF, PUGET
SOUND ENERGY, PUBLIC
COUNSEL, AND ALLIANCE OF
WESTERN ENERGY CONSUMER'S
JOINT MOTION TO CONTINUE
DATE FOR COMMISSION REVIEW
AND APPROVAL OF THE PETITION
OF PUGET SOUND ENERGY FOR
APPROVAL OF ITS APRIL 2019
POWER COST ADJUSTMENT
MECHANISM REPORT

1 Staff of the Washington Utilities and Transportation Commission (“Commission”), Puget Sound Energy (“PSE”), The Public Counsel Unit of the Attorney General’s Office (“Public Counsel”), and the Alliance of Western Energy Consumers (“AWEC”) (jointly referred to as the “Parties”) file this joint motion respectfully requesting that the Commission continue the date for Commission review and approval of the Petition of Puget Sound Energy for Approval of its April 2019 Power Cost Adjustment Mechanism Report (“2019 PCA Petition”)¹ from September 30, 2019 to November 22, 2019 (“Motion”).

2 On April 30, 2019, PSE filed the 2019 PCA Petition. The 2019 PCA Petition was filed pursuant to the Sixteenth Supplemental Order in Docket Nos. UE-011670 and UG-011671, and the Final Order Approving and Adopting Settlement Stipulations in Docket No. UE-130617 (“Order 11”). Order 11 provides:

In April of each year, the Company shall file an annual report detailing the power costs included in the deferral calculation, in a form satisfactory to the Commission, for Commission review and approval by September 30 of that year.²

¹ The 2019 PCA Petition covers the twelve-month period from January 1, 2018 through December 31, 2018 (PCA Period 17).

² *Wash. Util. & Transp. Comm’n v. Puget Sound Energy*, Docket UE-130617, Order 11, Appx. A, ¶ 3(c) (emphasis added).

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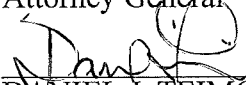

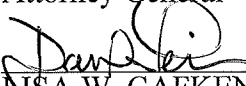

The standard for granting a continuance is “good cause” and that the continuance will not prejudice any party or the Commission.³ Good cause exists in this case. The Parties agree that greater time to conduct discovery is needed to provide a response to PSE’s 2019 PCA Petition, and that continuing the date for Commission review and approval of the 2019 PCA Petition from September 30, 2019 to November 22, 2019 would provide sufficient time to complete discovery. Additionally, a continuance would not prejudice the Parties (all of whom join in the Motion) or the Commission.

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For the above reasons, the Commission should grant the Parties’ joint Motion to continue the date for Commission review and approval of the 2019 PCA Petition from September 30, 2019 to November 22, 2019.

Dated this 18th day of June, 2019.

Respectfully submitted,

<p><i>On behalf of Commission Staff</i> ROBERT W. FERGUSON Attorney General  <u>DANIEL J. TEIMOURI, WSBA No. 47965</u> Assistant Attorney General Office of the Attorney General Utilities and Transportation Division P.O. Box 40128, Olympia, WA 98504-0128 (360) 664-1189 daniel.teimouri@utc.wa.gov</p>	<p><i>On behalf of Puget Sound Energy</i> PERKINS COIE LLP  <u>DONNA L. BARNETT, WSBA No. 36794</u> 10885 NE Fourth Street, Suite 700 Bellevue, WA 98004-5579 (425) 635-1419 dbarnett@perkinscoie.com</p>
<p><i>On behalf of Public Counsel</i> ROBERT W. FERGUSON Attorney General  <i>per email authorization</i> <u>LISA W. GAFKEN, WSBA No. 31549</u> Assistant Attorney General 800 Fifth Avenue, Suite 2000 Seattle, WA 98104-3188 (206) 464-6595 Lisa.Gafken@atg.wa.gov</p>	<p><i>On behalf of AWEC</i> DAVISON VAN CLEVE, P.C.  <i>per email authorization</i> <u>TYLER C. PEPPLER, WSBA No. 50475</u> 1750 SW Harbor Way, Suite 450 Portland, OR 97201-5133 (503) 241-7242 tcp@dvclaw.com</p>

for

for

³ WAC 480-07-305(2).