

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Amended Petition of**

**PUGET SOUND ENERGY, INC.**

**For an Order Authorizing the Use of the  
Proceeds from the Sale of Renewable  
Energy Credits and Carbon Financial  
Instruments**

**Docket No. UE-070725**

**MOTION OF PUGET SOUND  
ENERGY, INC. FOR  
EXTENSION OF TIME**

1. Pursuant to WAC 480-07-385, Puget Sound Energy, Inc. ("PSE") respectfully requests that the Washington Utilities and Transportation Commission (the "Commission") grant an extension of time to make the compliance filing necessary to comply with paragraphs 64 and 65 of the Commission's Order No. 03, entered May 20, 2010, in this docket ("Order No. 03").

2. Order No. 03 envisions two separate compliance filings. Paragraph 93 of Order No. 03 requires PSE to make a compliance filing within 10 days following the date of Order No. 03 that provides "a full accounting of [PSE's] calculation of net proceeds from the sales of RECs and CFIs through November 30, 2009, with supporting narrative explanation." Order No. 03 at ¶ 93. Paragraph 93 further states that parties to this proceeding "will have an opportunity to challenge PSE's determination of net proceeds within 5 days following [PSE's] compliance filing and the Commission will give notice of and conduct such additional process as may be necessary to resolve any dispute." *Id.* Concurrent with this Motion of Puget Sound Energy, Inc. for Extension of Time, PSE is submitting its filing to comply with paragraph 93 of Order No. 03. PSE is not requesting an extension of time for this part of the compliance filing.

3. Paragraph 64 of Order No. 03 requires PSE and the other parties to the proceeding to present the following:

either an agreed proposal or individual proposals concerning what interest rate should be applied to current and future REC balances and how these proceeds received through November 30, 2009, from the sale of RECs should be credited to customers in the near term. In general, we envision this could be in the form of a one-time bill credit or in a series of bill credits over as many as 12 months corresponding roughly to the rate year in Docket UE-090704, which will end on April 7, 2011. Other options may, however, be more appropriate.

*Id.* at ¶ 64. Paragraph 65 of Order No. 03 requires that parties file the agreed proposal or individual proposals, including supporting evidence and argument, on or before June 10, 2010.

*Id.* at ¶ 65.

4. PSE has filed a Petition for Reconsideration of the Commission's ruling that future REC balances in the regulatory liability account will both accrue interest and reduce PSE's rate base for ratemaking purposes,<sup>1</sup> among other issues. Further, PSE has been working diligently with Commission Staff to develop an agreed upon proposal as to how the proceeds from the sale of RECs should be credited to customers. However, it is unlikely that a comprehensive proposal can be developed and reviewed by other parties by the June 10, 2010 deadline. Additional time is needed to develop a comprehensive proposal upon which the parties can agree.

5. PSE requests an extension of time for filing the compliance filing anticipated by paragraph 64 of Order No. 3 to Tuesday, June 22, 2010. Good cause for the extension exists because PSE is working with the parties to develop a comprehensive proposal as to how these proceeds from the sale of RECs should be credited to customers. It will also allow the

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<sup>1</sup> See Order No. 03 at ¶¶ 66, 68.

Commission time to rule on PSE's Petition for Reconsideration of the Commission's decision that future REC balances in the regulatory liability account will both accrue interest and reduce PSE's rate base for ratemaking purposes. An extension of time to submit the compliance filing will not prejudice any party or the Commission because PSE seeks the extension of time to attempt to develop a comprehensive proposal to which all parties to the proceeding can agree.

6. On June 1, 2010, PSE advised Commission Staff and all parties to the case of PSE's intention to request this extension of time. Commission Staff, The Energy Project and the Industrial Customers of Northwest Utilities have agreed to the extension. Kroger and the Northwest Energy Coalition do not object to the extension. PSE has not yet heard back from Public Counsel and Renewable Northwest Project.

DATED: June 1, 2010

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