

**BEFORE THE
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

DOCKET UE-200980

Complainant,

PETITION OF
PUGET SOUND ENERGY FOR
EXEMPTION FROM WAC 480-100-
197 AND ORDER 03

V.

PUGET SOUND ENERGY

Respondent

I. INTRODUCTION

1. Puget Sound Energy (“PSE”) respectfully requests that the Commission allow for less than thirty days’ notice to customers of the virtual public comment hearing scheduled for April 20, 2021 in this docket, and grant an exemption as set forth below.

2. PSE requests an exemption from WAC 480-100-197 and Order 03, paragraph 17, issued by the Commission on January 14, 2021. Together, this rule and the prehearing conference, require that “PSE customers must receive notice of the date, time, and the methods for participating in the public comment hearing, as well as other information required under WAC 480-100-197, at least thirty days prior to the date of the public comment hearing.” For the reasons discussed below, due to Force Majeure, PSE is unable to provide all its customers with thirty days notice of the public comment hearing.

3. WAC 480-100-008 and WAC 480-07-110 provide that the Commission may grant an exemption from the provisions of any Commission rule, if consistent with the public interest, the purposes underlying the regulation, and applicable statutes.

4. PSE respectfully requests that the Commission allow PSE to provide individual customer notice within *twenty* calendar days of the scheduled April 20, 2021 virtual public comment hearing, rather than thirty days, for the reason of Force Majeure. PSE uses a vendor, KUBRA, to mail out customer bills and other informational mailings. KUBRA is located in Coppell, Texas. After the individual customer notices were designed and printed in Seattle, WA, they were shipped to KUBRA on February 10, 2021. The truck carrying the shipment of printed notices from Washington to Texas was delayed for multiple days due to extreme weather conditions in the state of Texas during the week of February 14, 2021. The shipment was delayed until weather conditions allowed for the delivery to be completed on February 23, 2021. As a result of this unforeseen delay, KUBRA was not able to begin mailing the notices until February 24, 2021. PSE estimates that of its approximately 1.2 million electric customers, approximately 321,000 customers will experience a delay in receiving their notice.

5. PSE has kept Commission Staff informed about this situation, and PSE is making this exemption request at the recommendation of Commission Staff.

6. The requested exemption would not result in any customers receiving their notice on or after the virtual hearing date. All customers would have at least twenty days notice prior to the hearing and the vast majority of customers would receive at least thirty days notice of the public comment hearing. Additionally, PSE has agreed to provide an additional electronic communication to all impacted customers who have provided an email address in order to provide a full thirty days' notice to as many of these customers as possible.

7. PSE is engaged in the business of providing electric and natural gas service within the State of Washington as a public service company and is subject to the regulatory authority of the Commission as to its retail rates, service, facilities and practices. Its full name and mailing address are:

Puget Sound Energy
Attn: Jon A. Piliaris
Director, Regulatory Affairs
P.O. Box 97034
Bellevue, Washington 98009-9734

II. CONCLUSION

8. PSE respectfully requests the Commission issue an Order allowing an exemption of the customer noticing provisions of WAC 480-100-197 and Order 03, paragraph 17, in this docket, and authorize PSE to provide individual customer notice within twenty calendar days of the scheduled virtual public comment hearing.

DATED this 11th day of March 2021.

Puget Sound Energy

By /s/ Jon Piliaris
Director, Regulatory Affairs
Puget Sound Energy
PO Box 97034, EST-07W
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425-456-2142
Jon.Piliaris@pse.com

DECLARATION

I, Jon A. Piliaris, declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed at Issaquah, Washington, this 11th day of March, 2021

 /s/ Jon Piliaris
Jon A. Piliaris