

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

Docket UE-190529  
Docket UG-190530  
*(consolidated)*

---

In the Matter of the Petition of

PUGET SOUND ENERGY

For an Order Authorizing Deferral Accounting  
and Ratemaking Treatment for Short-life  
UT/Technology Investment

Docket UE-190274  
Docket UG-190275  
*(consolidated)*

---

In the Matter of the Petition of

PUGET SOUND ENERGY

For an Order Authorizing Deferred Accounting  
associated with Federal Tax Act on Puget Sound  
Energy's Cost of Service

Docket UE-171225  
Docket UG-171226  
*(consolidated)*

---

In the Matter of the Petition of

PUGET SOUND ENERGY

For an Order Authorizing the Accounting  
treatment of Costs of Liquidated Damages

Docket UE-190991  
Docket UG-190992  
*(consolidated)*

**PUGET SOUND ENERGY'S  
MOTION TO EXTEND  
COMPLIANCE FILING DEADLINE**

## I. INTRODUCTION

1. Pursuant to WAC 480-07-110, WAC 480-07-385, and WAC 480-07-880, Puget Sound Energy (“PSE”) respectfully moves the Washington Utilities and Transportation Commission (“Commission”) to extend the time for a compliance filing resulting from the July 8, 2020 Final Order in the above-referenced dockets (“Order”). Good cause exists for the Commission to extend the time for a compliance filing because in conjunction with this motion, PSE has filed a motion for clarification of the Order and is unable to file a compliance filing until it receives clarification on several points from the Order.

## II. BACKGROUND

2. PSE filed its general rate case on June 20, 2019. After a fully-litigated case involving nine parties, testimony, motions, hearings, and briefing, the Commission issued the 215-page Order. The Order directs PSE to make a compliance filing to effectuate the terms of the Order, and states that the effective date must allow five business days for Commission Staff review, but it does not explicitly state a date for the compliance filing.<sup>1</sup> However, in a few sections, the Order indicates that rates should become effective July 20, 2020.<sup>2</sup>
3. On July 9, 2020, counsel for PSE notified Administrative Law Director Rayne Pearson and parties that PSE intended to file a motion for clarification and would not be able to file a compliance filing until some points in the order were clarified. On July 16, 2020, Judge Pearson advised counsel for PSE to file a formal motion for extension of the compliance filing deadline. Accordingly, PSE files this motion along with its motion for clarification.

---

<sup>1</sup> See Order ¶ 802.

<sup>2</sup> See *id.* ¶¶ 33, 132, 382-83, 418 & 764 (¶ 739 implies a tariff filing date but states GTZ amortization period begins June 20, 2020, which PSE seeks clarification of the date).

### III. DISCUSSION

4. WAC 480-07-385 allows the Commission to extend the time to comply with an order upon the showing of good cause for the extension.<sup>3</sup> Good cause exists to extend the date for a compliance filing because PSE has filed a motion for clarification that seeks clarification on several points in the Order, the resolution of which is necessary for PSE to comply with the terms of the Order.<sup>4</sup> Accordingly, the timing for PSE to conduct a compliance filing should be extended until after the Commission rules on the motion for clarification.<sup>5</sup>
5. No parties will be prejudiced by the Commission granting an extension for a compliance filing. The Order authorized a rate increase.<sup>6</sup> Customers will not be harmed by a delay in implementing a rate increase. Furthermore, an extension is in the public interest because if PSE were to file a compliance filing that did not accurately effectuate the intent of the Order due to confusion or misunderstanding of the Order, it could harm PSE or its customers and could cause the need for later amendment or correction of the order.<sup>7</sup> PSE seeks this extension to allow for Commission clarification of the Order, which will better allow parties to know their rights and responsibilities under the Order.<sup>8</sup>
6. PSE requests the Commission grant an extension of the compliance filing deadline to ten (10) business days after the Commission issues a clarification order; or if the Commission denies the motion for clarification, then ten (10) business days after an order denying the motion. PSE reserves its right to seek further post-order process as set forth in Chapter 480-07 WAC, after the

---

<sup>3</sup> WAC 480-07-110 also provides that “The commission, in response to a request or on its own initiative, may grant an exemption from, or modify the application of, any of its rules in individual circumstances if the exemption or modification is consistent with the public interest, the purposes underlying regulation, and applicable statutes.”

<sup>4</sup> See *In the Matter of the Review of: Unbundled Loop & Switching Rates; the Deaveraged Zone Rate Structure; & Unbundled Network Elements, Transp., & Termination (Recurring Costs)*, Docket UT-023003, 25th Supplemental Order (Feb. 17, 2005) (granting motion to extend time for clarification and to extend compliance filing deadline for good cause).

<sup>5</sup> Additionally, in light of the Commission Staff Friday furlough days during the month of July, PSE would have had to file a compliance filing the day following issuance of the Order to allow Staff five business days for review prior to a rate effective date of July 20, 2020.

<sup>6</sup> See Final Order ¶ 798.

<sup>7</sup> See WAC 480-07-880.

<sup>8</sup> See WAC 480-07-835.

Commission rules on the motion for clarification, including but not limited to a petition for reconsideration, which could require a further extension of the compliance filing date.

#### **IV. CONCLUSION**

7. For the reasons set forth above, PSE respectfully requests that the Commission enter an order extending the time for a compliance filing as set forth above.

DATED this 17th day of July, 2020.

**Respectfully submitted**

**PERKINS COIE LLP**

By 

Sheree Strom Carson, WSBA # 25349

Jason T. Kuzma, WSBA #31830

Donna L. Barnett, WSBA #36794

David S. Steele, WSBA #45640

Attorneys for Puget Sound Energy