

**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 FOR CLARIFICATION OF
FINAL ORDER**

I. INTRODUCTION

- I.* Pursuant to WAC 480-07-835, Puget Sound Energy ("PSE") respectfully requests that the Washington Utilities and Transportation Commission ("Commission") clarify the

Commission’s final order, served on July 8, 2020, in the above captioned consolidated dockets (“Final Order”). Through this motion, PSE seeks to clarify the meaning and requirements in the Final Order, make technical changes to reconcile the application of principle to data, resolve inconsistencies, and correct patent error in the Final Order. PSE requests the Commission modify the Final Order to clarify the items listed below.

II. DISCUSSION OF POINTS FOR CLARIFICATION

2. PSE requests clarification of the following paragraphs of the Final Order.

A. Advanced Metering Infrastructure (“AMI”) Deferral, Paragraph 155

3. There are three issues to be clarified with respect to the Commission’s Final Order on the AMI deferral. First, PSE requests clarification that it can defer the return on investment of AMI placed in service through December 31, 2019, based on actual balances. In paragraph 155, the Commission states “we allow into rates the test year AMI costs, deferral for the return of, and pro forma adjustments through December 31, 2019, *but continue to require PSE to defer recovery of the return on these investments* in a deferral account . . . per the terms of the Settlement Stipulation in the 2018 ERF.” (Emphasis added.) However, the ERF Settlement Stipulation allowed PSE to defer its return on investment on AMI plant put into service in the ERF test year (through June 30, 2018) but did not allow deferral of the return on AMI investments made after the ERF test year.¹ PSE seeks clarification to resolve this inconsistency.

4. Second, PSE requested rate base treatment for the depreciation deferral on AMI investments placed in service through December 31, 2019.² Recovery of this depreciation deferral was approved in this proceeding.³ The Commission did not explicitly address this issue but in recalculating amounts in Appendix A, it appears that the Commission order does not allow rate base treatment for the AMI depreciation deferral. PSE seeks clarification that it is also

¹ *WUTC v. PSE*, Dockets UE-180899/UG-180900 Settlement Stipulation and Agreement (“ERF Settlement”) ¶ 11 (“PSE will not defer the cost of capital on AMI investments made after the ERF test year.”).

² See Exh. SEF-1Tr at 52:1-4; Exh. SEF-6E p.22; Exh. SEF-6G p. 22.

³ See ¶155 in Final Order No. 08 in UE-190529, *et al.*

allowed to defer a return on the depreciation deferral consistent with the utility plant treatment ordered by the Commission in this case. If PSE is not allowed to defer the return on the depreciation deferral, PSE seeks clarification for how the depreciation deferral should be treated from a working capital perspective. The clarification of these items will have no impact on revenue requirement.

5. Third, it does not appear the Commission ruled on PSE’s request to defer AMI depreciation for plant in service after December 31, 2019. Accordingly, PSE seeks clarification that it is allowed to defer AMI depreciation for plant in service after December 31, 2019, as requested by PSE,⁴ and consistent with the ERF settlement.⁵ PSE would calculate this deferral similar to the way in which it will calculate the Get to Zero (“GTZ”) deferral for which it seeks clarification in Section E below. There is no impact to revenue requirement if the Final Order is clarified to allow PSE to continue deferring depreciation on AMI plant after December 31, 2019.

B. Power Cost Hydro Modeling, Paragraph 278

6. Paragraph 278 of the Final Order requires PSE to run the AURORA model 80 times and cites to a \$6.3 million reduction in power costs. However, as indicated in the testimony of Staff witness Jing Liu⁶, the \$6.3 million variance is based on an estimate from PSE’s direct testimony⁷—it does not incorporate updates included in PSE’s rebuttal power cost estimates. After the Final Order was issued, PSE reran the AURORA model to determine the actual reduction, which is \$5,670,666 or, approximately \$578,000 less of a reduction than the estimate presented in direct testimony. This correction will result in an increase to the revenue requirement roughly equal to

⁴ See Exh. SEF-1Tr at 51:12-13; Exh. SEF-17T at 40:19- 41:12

⁵ ERF Settlement ¶ 11 (allowing PSE to defer “depreciation expense of the AMI investments made after the ERF test year on an ongoing basis until all such AMI plant in service is included in rates or has been disallowed from rate recovery.”).

⁶ Exhibit JL-1CT at 48 footnote 44.

⁷ Table 11 on page 62 of Exhibit PKW-01CT, the Prefiled Direct Testimony of Paul K. Wetherbee, presented an estimate of \$6.249 million.

\$578,000. PSE seeks clarification as to whether it should use the actual variance calculated using the model inputs from its rebuttal filing.⁸

C. Green Direct Program PPAs, Paragraph 294, 297, 757

7. PSE seeks clarification of two issues with respect to Green Direct PPAs. First, PSE seeks clarification of paragraphs 294 and 757, which require PSE to remove the Green Direct PPA costs from rate-year power costs, net of replacement power costs. According to the Final Order, this reduces rate year power costs by \$13.1 million based on an estimate. This estimate, which was presented in PSE's rebuttal filing,⁹ was calculated outside the model by removing the contract costs net of an estimate of replacement power costs. After the Final Order was issued, PSE reran the AURORA model to determine the actual amount of reduction. When the model is run 80 times consistent with the Final Order, removing the Green Direct PPAs reduces rate-year power costs \$12.6 million. The \$0.5 million difference will result in an increase to the revenue requirement roughly equal to \$0.5 million. PSE seeks clarification as to whether it should use the actual reduction to the rate year power costs calculated by rerunning the AURORA model using the model inputs discussed in Section B, above, rather than the estimate cited in the Commission's Final Order.

8. Second, PSE seeks clarification of paragraph 297, with respect to tracking costs of Green Direct program participants. Paragraph 297 states "the costs of providing power to Green Direct program participants until the PPAs are in service should be separately tracked using Schedule 139 to ensure only program participants bear those costs." Given that the billing of Green Direct (Schedule 139) service to participants does not start until PSE takes delivery of electricity under the PPA, there will be no "costs of providing power" to track prior to the delivery of electricity.¹⁰ Therefore, PSE seeks clarification that it is not required to track the costs of providing power to

⁸ These are the inputs from the rebuttal filing that were not changed in the Commission's Final Order.

⁹ Exh. PKW-34CT at 23 row 10.

¹⁰ Tracking and deferral of any liquidated damages received net of costs such as pre-program REC purchases applied against those proceeds is already provided for in paragraphs 452 and 454 of the Final Order.

Green Direct program participants under Schedule 139 prior to the in-service dates of the PPAs as there will be no costs to track. This clarification resolves inconsistencies in the Final Order and does not impact the revenue requirement.

D. Staff's Mitigation Proposals, Paragraphs 642, 662, 728 and 797

9. PSE seeks clarification of three issues with respect to the Commission's adoption of Staff's rate mitigation proposals as discussed in the above referenced paragraphs. First, PSE seeks clarification of paragraphs 642, 662, 728 and 797 as to whether the Commission is ordering PSE to rerun power costs or gas costs. In paragraph 642, the Final Order lists mitigation factors identified by Commission Staff, including updating the electric power supply cost baseline and updating natural gas PGA rates. In paragraph 662, the Commission adopted Staff's mitigation proposal but did not specify whether PSE is required to rerun power costs or update PGA rates.¹¹ PSE seeks this clarification to resolve this inconsistency.
10. Second, regarding paragraph 662, PSE seeks clarification with respect to calculating the electric decoupling regulatory asset balance for Staff's mitigation proposal in the compliance filing. Should PSE use the outdated estimated amounts included in paragraph 662 of the Final Order or should PSE use estimates of these balances as of the date rates will change (i.e., using June 2020 actual asset balance + July and/or August estimates depending on when PSE's compliance filing is filed). The estimated revenue requirement impact of updating the asset balance would result in an increase in revenue requirement of approximately \$1.2 million, changing the decrease in revenue requirement from this mitigation measure from \$10.9 million to \$9.7 million. Additionally, regarding paragraph 662, PSE seeks clarification with respect to calculating the regulatory asset balance for Staff's PGA mitigation proposal for the natural gas compliance filing. Should PSE use the outdated estimated amounts included in paragraph 662 of the order or should PSE use estimates of these balances as of the date rates will change (i.e.,

¹¹ The only aspect of Staff's proposal that the Commission expressly did not accept was the extension of the regulatory asset associated with the gas decoupling deferral, which is discussed in paragraph 662.

using June 2020 actual asset balance + July and/or August estimates, depending on when PSE's compliance filing is filed). The estimated revenue requirement impact of updating the asset balance would result in a decrease in revenue requirement of approximately \$4.2 million, changing the decrease in revenue requirement from this mitigation measure from \$30.8 million to \$35.1 million.

11. Third, in paragraph 662, the revenue requirement adjustment amounts listed for storm and environmental amortizations are in fact amortization expense amounts that have not been grossed up for revenue sensitive items. To enhance compliance, PSE requests clarification that the amounts listed in paragraph 662 should be grossed up for revenue sensitive items in order to represent the accurate revenue requirement impact of these adjustments. This will increase revenue requirement by approximately \$1 million.

E. Ongoing/Continued GTZ Deferral, Paragraphs 30, 441, 442, 703 and 770

12. PSE seeks clarification of the GTZ deferral due to inconsistencies in the Final Order. It appears from paragraphs 30, 441, 703, and 770 that PSE has been granted the ability to *continue to defer* GTZ costs. In paragraph 441, the Commission "authorize[d] PSE to defer the depreciation expense that the Company has incurred, *or will incur, outside of the test year used in the Company's next GRC.*" (Emphasis added.) However, paragraph 442 indicates that the Commission is not granting PSE an "ongoing" deferral. PSE requests several clarifications, as discussed below.

13. Based on this apparent inconsistency, PSE seeks clarification that it is granted a continuing deferral beyond the deferral in this case. If so, it appears the Commission is granting a deferral in paragraphs 30, 441 and 442 for investments that are placed in service between January 2020¹² and *the month prior to the test year* of PSE's next general rate case; and that the Commission is *not* granting an ongoing deferral for investment in GTZ projects that go into service starting with the first month of the test year in PSE's next general rate case. If the above

¹² Or July 2019 depending on the clarification provided for Part F.

is true, it is inconsistent with the deferral that was approved in this case by the Commission. The GTZ deferral the Commission approved in the Final Order included property that went into service through December 2019,¹³ well past the month prior to the beginning of the test year. To be consistent, PSE seeks clarification that it should be permitted to include assets in the deferral through the pro forma period of the next case – which is consistent with what appears to be approved in this case – rather than only through the month prior to the beginning of the test year of the next case. PSE seeks further clarification that the amounts deferred will be the depreciation on those assets for the period January 2020 through *the date rates go into effect* in PSE’s next general rate case,¹⁴ which is also consistent with what has been approved in this case.

F. Amortization of Deferral of GTZ Investment, Paragraphs 132 and 739

14. PSE seeks clarification of paragraph 739, which authorizes PSE to “amortize deferred GTZ expense *and rate base* amounts for the GTZ assets placed in service between July 2018 and *June 2019* over a three-year amortization period beginning *June 20, 2020*” (emphasis added). There are three clarifications PSE seeks regarding this sentence.
15. First, PSE has not sought deferral of rate base return on its GTZ assets in this consolidated proceeding. PSE conservatively asked only for a deferral of depreciation expense and carrying charges. PSE believes it is possible the Commission was referring to the deferral of carrying charges that the Commission approved in paragraph 443. Therefore, PSE is seeking clarification that the term “and rate base amounts” should be changed to “and carrying charges.”¹⁵
16. Second, PSE’s GTZ depreciation deferral included in PSE’s Response to Bench Request No. 011 and in Appendix A to the Final Order includes deferral of depreciation on assets placed

¹³ Or July 2019 depending on the clarification provided for Part F.

¹⁴ See Exh. SEF-17T at 41:7-9.

¹⁵ See PSE’s Response to Bench Request No. 011, Attachment A - cell GJ19 (electric) and GJ32 (gas) in tab “Common Adj” in files “190529-30-PSE-WP-SEF-18.00E-ELECTRIC-MODEL-REBUTTAL-19GRC-01-2020.xlsx” and “190529-30-PSE-WP-SEF-18.00G-GAS-MODEL-19GRC-01-2020.xlsx”

in service through December 2019.¹⁶ Therefore, PSE seeks clarification that it is allowed to amortize the depreciation deferral that includes depreciation on assets through December 31, 2019. This treatment would be in concert with the clarification PSE is seeking in Section E.

Third, the date of June 20, 2020 for the start of the amortization period, as set forth in paragraph 739, appears to be a misstatement because the Final Order was not issued until July 8, 2020. Paragraph 132 uses July 20, 2020. PSE requests clarification of paragraphs 132 and 739 to reflect an amortization period beginning on the date rates go into effect. These requested clarifications would enhance compliance and have no impact on revenue requirement.

G. Carrying Charges on GTZ Deferral, Paragraph 443

17. The Commission ordered PSE to use the FERC rate for carrying charges on the GTZ deferral in paragraph 443. The GTZ adjustment in PSE's Response to Bench Request No. 011 uses PSE's requested authorized rate of return to determine the carrying charges. It does not appear that amounts in Appendix A use the FERC rate. PSE requests clarification of the carrying charges to be used based on the inconsistency between paragraph 443 and Appendix A.

H. Volumetric True-up of 2018 ARAM Amounts in Sched. 141X, Paragraphs 381-383

18. In calculating the volumetric true-up for amounts currently included in Schedule 141X that is passing back 2018 EDIT Reversals, the Final Order only addresses amounts passed back through May 2020. PSE believes the amount of revenues to be credited for amounts passed back in Schedule 141X for purposes of this volumetric true-up should run through July 2020 to coincide with the approximate date rates will change in this proceeding. PSE requests clarification that the references to May 19, 2020 in paragraphs 381-383 should be changed to July 2020. This clarification makes technical changes to reconcile the application of principle to data, resolve inconsistencies, and correct patent error. The impact to revenue requirement is an increase of \$4.1 million (combined gas and electric).

¹⁶ See PSE's Response to Bench Request No. 011, Table on page 2 of page 2 in section i.2. of PSE's Response to Bench Request No. 012.

I. Removal of PSE’s Protected Plus EDIT, Paragraph 365(2) and Appendix A, Contested Adjustment 6.03 (Electric and Gas)

19. PSE believes the Final Order removes the wrong amount of average rate assumption method (“ARAM”) reversal (which is negative revenue requirement) from PSE's adjustments 6.03 on Appendix A under the Commission’s treatment of PP EDIT balances. PSE believes the Final Order should have removed net operating income (“NOI”) of \$23.5 million for electric and \$6.2 million for gas¹⁷ under the Commission’s treatment of PP EDIT balances. These amounts equate to \$31.2 million for electric and \$8.3 million for gas in revenue requirement. However, it appears that the Final Order only removed \$4.9 million of NOI for electric (determined by subtracting the negative NOI of \$19.9 million from App. A from the negative \$14.9 million from PSE’s Response to Bench Request No. 011) and \$1.3 million of NOI for gas (determined by subtracting the negative NOI of \$0.1 from App. A from the positive \$1.2 million from PSE’s Response to Bench Request No. 011). These NOI amounts equate to \$6.5 million for electric and \$1.7 million for gas of revenue requirement. Therefore, PSE believes the difference in revenue requirement associated with not removing enough ARAM from PSE's adjustment when utilizing the Commission’s approach to returning PP EDIT to customers, is \$24.6 million for electric and \$6.5 million for gas. It appears that the amount actually removed in Appendix A is equal to 21% of EDIT reversal amounts reported in the table on page 2 of Attachment E to PSE’s Response to Bench Request No. 13 while PSE believes it should have been the full amount of the EDIT reversal reported in the table on page 3 of PSE’s Response to Bench Request No. 013. To support PSE’s belief that the full amount of EDIT reversal should be removed from PSE’s tax adjustment under the Commission’s ruling, PSE notes that this is the same procedure that was followed when setting Schedule 141X in PSE’s expedited rate filing in Dockets UE-180899 and UG-180900.¹⁸ PSE seeks clarification that the full amount of ARAM of \$23,462,101 million for electric and \$6,234,133 million for gas should be removed from PSE’s tax adjustment under the

¹⁷ See PSE’s Response to Bench Request No. 013(c).

¹⁸ The amounts used in PSE’s ERF included Flow Through reversal as well as EDIT reversal.

Commission's approach to returning PP EDIT to customers. This clarification makes technical changes to reconcile the application of principle to data and corrects patent errors in the Commission's approach to returning PP EDIT to customers. The impact to revenue requirement is an increase of \$31.2 million (combined gas and electric).

J. Administration of Schedule 141X, Paragraphs 365, 366, 369 and 373

20. PSE seeks clarification of the nature of the true-up of Schedule 141X ordered by the Commission. Paragraphs 365(5) and (6) and 366 require PSE to true-up Schedule 141X annually with the difference caused by load variances between what is set in the rate versus what is actually passed back, and does not make reference to trueing up the rate for the difference between the estimated amount of EDIT reversals and the actual amounts included on PSE's tax returns. The Commission states in paragraph 369 that the total amount of EDIT is known; however, the timing over which it turns around year by year is dependent on book depreciation and retirements which are estimated for purposes of closing PSE's books for the year or for purposes of providing information as was done in PSE's Response to Bench Request No. 013. Accordingly, the actual amount of EDIT reversals that will be included in a tax return are not known until the following year when the tax return is filed. In other words, PSE's EDIT reversals that were booked in 2019 based on an estimate will not be known until September 2020 when PSE files its final 2019 tax return. The amounts the Commission is ordering to be included in Schedule 141X for 2019 and 2020 are estimates.¹⁹ Further, paragraph 373 indicates that EDIT reversals must be returned dollar for dollar. PSE seeks clarification on whether the Commission is ordering it to true-up Schedule 141X each year not only for volumetric differences, but also for differences between the estimate of EDIT reversal set in the rate for the prior year and the actual amount of EDIT reversal filed on PSE's tax return for the applicable year. PSE seeks this

¹⁹ See column headings "2019 Estimate" and "2020 Estimate" in PSE's Response to Bench Request No. 013 parts B. (i) and (ii).

clarification in order to clarify the meaning and requirements in the Final Order related to administration of Schedule 141X.

K. Schedules 141X and 141Z, Paragraphs 325, 366, 662

21. Paragraphs 325 and 662 direct PSE to pass back grossed-up EDIT using Schedule 141Z based on class usage and consistent with Schedule 141X. PSE requests clarification as to whether the rate design for Schedule 141Z should apply to volumetric rates only, as is specified for Schedule 141X.²⁰

22. PSE requests further clarification of paragraphs 325 and 366, which require PSE to allocate Schedule 141X and Schedule 141Z income tax benefits to customer classes based on class usage. In PSE's cost of service study for both electric and gas operations, income taxes are allocated to customer classes based on rate base so it seems appropriate to allocate the tax benefits passed back through Schedule's 141X and 141Z in the same manner. PSE seeks clarification that the Commission intended class usage as the method of allocation instead of rate base. If class usage is used to allocate the income tax benefits this will result in large usage commercial and industrial customer classes getting a larger share of the income tax benefits. This is illustrated in Attachment A to PSE's Motion for Clarification. For electric operations, Schedule 449 transportation customers would actually experience negative rates and bills under the class usage allocation methodology as their share of the income tax benefit would be greater than all UTC jurisdictional rate revenue. If rate base is used to allocate the income tax benefits, the allocation would be on the rate base included in state-jurisdictional rates, as Schedule 449 transportation customers will receive their EDIT benefits for FERC-jurisdictional transmission through PSE's formula transmission rates. This clarification seeks to resolve this inconsistency in the Final Order with respect to allocation of taxes.

²⁰ See Final Order ¶ 366.

L. Colstrip Units 1 and 2 Rate Base, PTCs, and Regulatory Asset Treatment, Paragraph 418, 701 and 765

23. Paragraph 418 requires PSE to (i) adjust established regulatory assets to reflect unrecovered, undepreciated plant balance as of December 31, 2019, (ii) include depreciation in rates through July 19, 2020, and (iii) report the updated balance. PSE's Response to Bench Request No. 11 included 2018 test year end of period plant balances for Colstrip Units 1 and 2 in rate base and did not include a regulatory asset for the unrecovered plant for those units. Based on footnote 460 in the Final Order, it appears the Commission interpreted Ms. Free's affirmative response on cross examination that the plant balances had been moved to a regulatory asset as of December 31, 2019²¹ to mean that the transfer had been reflected in the general rate case, which is not the case. Ms. Free understood the question to address PSE's books supporting its current financial statements, not what was reflected in the rate case, filed June 20, 2019. The Commission is ordering adjustment to the regulatory asset that the Commission believed to be included in the filing through the date rates change in this proceeding. However, the regulatory asset is not reflected in PSE's filing while the 2018 utility plant balances are included. It appears the Commission may have intended to reflect the removal of the utility plant balances included in PSE's filing from rate base and the addition of the regulatory asset as of July 19, 2020 to rate base. Therefore, to achieve this result, PSE requests clarification of paragraph 418 to be consistent with the second column of Exh. SEF-29 page 2 lines 10 through 21 (or rows 18 through 29 in the MS Excel version). This would result in a net decrease to rate base of \$77.9 million and a decrease to the revenue requirement of \$7.7 million (Exh. SEF-29 line 1 and 21) from the amount set forth in the Final Order. This net decrease will be greater after updating to lower the regulatory asset balance for amortization through the date rates are changed that is required in paragraph 418. This clarification would make technical changes to reconcile the application of principle to data.

²¹ Free, TR 319:24-320:2.

M. Colstrip Units 3 and 4 Decommissioning and Remediation, Paragraphs 424 and 426

24. PSE seeks clarification to allow proper compliance with the Commission’s order related to the regulatory asset for decommission and remediation (“D&R”) costs for Colstrip Units 3 and 4. Paragraph 424 approves PSE’s requested depreciation rates and then requires PSE to “to move all D&R costs associated with Units 3 and 4 to a regulatory asset account for tracking purposes.” Further, Paragraph 426 orders that “PSE may continue to recover D&R costs through *depreciation rates* for Units 3 and 4 *and record those costs* to a regulatory asset account”. (Emphasis added.) The combined reference to “depreciation rates” and “those costs” in paragraph 426 makes it unclear which costs the Commission is seeking to have PSE defer. Therefore, PSE is requesting clarification for what should be transferred and tracked in the regulatory asset account. Should the amounts transferred be the actual amount spent on D&R for Colstrip Units 3 and 4? Is there anything else the Commission intended to be included in the regulatory asset? PSE seeks this clarification in order to properly comply with the Final Order.

N. Contested Electric Restating and Pro Forma Adjustments, 7.01 Power Costs in Appendix A (and fourth paragraph on page 3)

25. PSE seeks clarification of Electric Operations Appendix A, Contested Restating and Proforma Adjustments 7.01 for power costs. The net change to the NOI for the contested pro forma power costs adjustment 7.01 between Appendix A and PSE’s Response to Bench Request No. 011 is an increase of \$21.2 million in the Final Order. PSE seeks clarification of how the \$21.2 million was determined. PSE calculates the NOI change between PSE’s Response to Bench Request No. 011 and Appendix A that should result from the Commission’s order to be an increase to NOI of about \$16 million ($[\$13.1 \text{ million for Green Direct PPA} \times 79\%] + [\$6.3 \text{ million from hydro modeling} \times 79\%] + [\$1 \text{ million to remove Colstrip Unit 4 major maintenance event} \times 79\%]$). PSE seeks clarification to correct what appears to be patent error in Appendix A, Proforma Adjustments 7.01.

O. Fixed Method for Classification of Production and Transmission Charges, Paragraphs 468, 705, and 773

26. PSE seeks clarification to resolve inconsistencies in paragraph 468, and paragraphs 705 and 773. Paragraph 468 requires “PSE to continue to classify its production and transmission costs according to the Fixed Method[.]” However, paragraph 705, the Findings of Facts, and paragraph 773, the Conclusions of Law, state the Fixed Method applies to transmission without identifying production. PSE requests clarification as to whether PSE should classify costs for both production and transmission using the Fixed Method.

III. CONCLUSION

27. For the reasons set forth above, PSE respectfully requests that the Commission enter an order clarifying the Final Order with respect to the issues identified above.

DATED this 17th day of July, 2020.

Respectfully submitted

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ATTACHMENT A

[Pursuant to WAC 480-07-510, Attachment A is an MS Excel spreadsheet that if printed, would exceed five pages, would render the data unusable, and is thus provided in electronic format only.]