



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

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June 19, 2014

SENT VIA UTC WEB PORTAL & ABC LMI

Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: Puget Sound Energy Tariff WN U-2 Revision, RE: Natural Gas Compression Facilities, Docket UG-140721

Dear Mr. King:

Public Counsel submits this letter in response to Puget Sound Energy's (PSE) natural gas tariff filing regarding natural gas compression facilities, submitted on April 25, 2014. These comments address Public Counsel's concern regarding this proposal and our recommendations.

Public Counsel Recommendation

Public Counsel supports Staff's recommendation to suspend the tariff and set the matter for hearing.

PSE's tariff filing, if allowed to go into effect, would create a new service to customers that would install utility-owned compression facilities on the customer's premise for purposes of fueling natural gas vehicles (NGV). PSE filed a nearly identical letter and tariff on August 28, 2013, in Docket UG-131589. On October 30, 2013, the Commission issued an order in that docket, suspending the tariff filing, because the Company had not yet made a demonstration that the proposed rates for the service were fair, just, reasonable and sufficient.¹ Earlier this year, PSE withdrew that filing, and shortly after refiled the tariffs in the current docket.

As stated in our comments in Docket UG-131589, Public Counsel supports efforts to reduce greenhouse gases from the transportation sector. However, we believe that there are a number of open questions that should be further explored before this filing is allowed to go into effect. This filing would benefit from additional review under suspension, particularly the question of whether risk to ratepayers will be adequately addressed through the rates associated with the CNG service.

¹ Docket UG-131589, Order 01, ¶ 5.



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Public Counsel supports Staff's recommendation to suspend the tariff and set the matter for hearing.

I will attend the Commission's June 26, 2014, Open Meeting to address any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stefanie Johnson', written over the typed name.

Stefanie Johnson
Regulatory Analyst
Public Counsel
(206) 389-3040

cc: Dave Gomez (E-mail)
Ken Johnson (E-mail)