



ATTORNEY GENERAL OF WASHINGTON

800 Fifth Avenue #2000 • Seattle WA 98104-3188

July 25, 2013

SENT VIA ABC LMI AND E-MAIL

Steven V. King
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: *In the Matter of the Petition of Puget Sound Energy, Inc. For an Accounting Order
Authorizing Treatment Related to Payments for Major Maintenance Activities*
Docket UE-130583

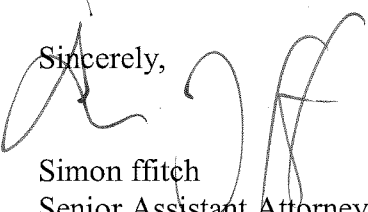
WUTC v PSE
Docket UE-130617

*In the Matter of the Petition of Puget Sound Energy, Inc. For an Accounting Order
Authorizing the Sale of the Water Rights and Associated Assets of the Electron
Hydroelectric Project in Accordance with WAC 480-143 and RCW 80.12*
Docket UE-131099

Dear Mr. King:

Enclosed for filing in the above-referenced docket are the original and eight (8) copies of Public Counsel's Response to WUTC Staff's Motion for Consolidation and the Certificate of Service.

Sincerely,


Simon Ffitch
Senior Assistant Attorney General
Public Counsel Division
(206) 389-2055

Sf:ar

cc: Service List (First Class Mail & Email)

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of
PUGET SOUND ENERGY, INC.

DOCKET UE-130583

For an Accounting Order Authorizing
Accounting Treatment Related to
Payments for Major Maintenance
Activities

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

DOCKET UE-130617

Complainant,

v.

PUGET SOUND ENERGY, INC.

Respondent.

In the Matter of the Petition of
PUGET SOUND ENERGY, INC.

DOCKET UE-131099

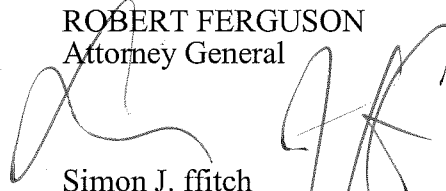
For an Accounting Order Authorizing
the Sale of the Water Rights and
Associated Assets of the Electron
Hydroelectric Project in Accordance
with WAC 480-143 and RCW 80.12

PUBLIC COUNSEL'S RESPONSE
TO WUTC STAFF'S MOTION FOR
CONSOLIDATION

- 1 Public Counsel responds to the Motion for Consolidation filed by Commission Staff in these matters on July 17, 2013. Public Counsel supports the request for consolidation and concurs in the reasoning stated in the Staff motion. Consolidation of these matters will enable efficient use of party and Commission resources, and foster consistency in addressing the issues.

2 Dated this 25th day of July, 2013.

ROBERT FERGUSON
Attorney General



Simon J. ffitch
Senior Assistant Attorney General
for Public Counsel Division

Lisa W. Gafken
Assistant Attorney General
for Public Counsel Division

CERTIFICATE OF SERVICE

**WUTC v PSE
Docket UE-130617**

**In the Matter of the Application of Puget Sound Energy, Inc. For an Order Authorizing the Sale of the Water Rights and Associated Assets of the Electron Hydroelectric Project in Accordance with WAC 480-143 and RCW 80.13
Docket UE- 131099**

I hereby certify that a true and correct copy of *Public Counsel's Response to WUTC Staff's Motion for Consolidation* was sent to each of the parties of record shown below in sealed envelopes, via: U.S. Mail and E-Mail

SERVICE LIST

**** = Receive Highly Confidential; * = Receive Confidential; NC = Receive Non-Confidential**

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DATED: July 25, 2013.



ANNYA RITCHIE
Legal Assistant