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STATE OF WASH  
UTIL. AND TRANSP  
COMMISSION

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

HARBHAJAN MANGAT,  
  
Complainant,  
  
v.  
  
PUGET SOUND ENERGY, INC.,  
  
Respondent.

DOCKET NO. UE-120522

PUGET SOUND ENERGY, INC'S  
ANSWER TO FORMAL COMPLAINT

Puget Sound Energy, Inc. ("PSE") answers the Formal Complaint of Harbhajan Mangat ("Ms. Mangat"), dated April 11, 2012, as follows, in paragraphs numbered to correspond to the paragraphs in said Complaint.

**ANSWER**

1. Answering the first sentence of the first paragraph, PSE has insufficient knowledge to admit or deny whether Ms. Mangat resides at 24257 Mangat Lane, in Sedro Woolley, Washington. PSE's records show that as of March 14, 2012, no electric or natural gas service was provided to Ms. Mangat at 24257 Mangat Lane. PSE's records show that electric service was provided to Khushdev S Mangat at that location from March 7, 2012 to March 13, 2012. The current customer at that address is neither Khushdev nor Harbhajan Mangat. Accordingly, PSE denies the first sentence of the first paragraph. Answering the

remainder of the first paragraph, PSE admits that the Complaint is a formal complaint addressing PSE's electric Tariff G, Schedule 85 Line Extensions and Refund Policies, which speaks for itself.

2. Answering the second paragraph, PSE admits that WAC 480-100-033 addresses electric distribution line extension tariffs. WAC 480-100-033 speaks for itself.

3. Answering the third paragraph, PSE denies that RCW 80.28.020 is as written in the third paragraph. RCW 80.28.020 speaks for itself.

4. Answering the fourth paragraph, PSE admits that RCW 80.28.020 establishes jurisdiction in the Commission to set rates that are just, reasonable, and sufficient. RCW 80.28.020 speaks for itself.

5. Answering the fifth paragraph, PSE admits that RCW 80.28.040 establishes jurisdiction in the Commission to set rates for water companies. PSE denies the implication that RCW 80.28.040 applies either to PSE or this matter.

**A. Prayer for Relief**

6. Answering the sixth paragraph, Ms. Mangat's request for relief, PSE denies the implication that WAC 480-100-033 provides for a Line Extension Refund Policy. Such policy is provided in PSE's tariff, not Commission rule. PSE denies the implication that RCW 80.28.040 provides the basis for any relief in this matter because RCW 80.28.040 applies only to water companies and PSE is not a water company. PSE neither admits nor denies the remainder of the sixth paragraph, which does not contain any factual or legal allegations that require an answer.

**B. Statement of Facts**

7. Answering the seventh paragraph, PSE has insufficient information to admit or deny the allegations in the seventh paragraph, and therefore denies the same.

8. Answering the eighth paragraph, PSE has insufficient information to admit or deny the allegations in the eighth paragraph, and therefore denies the same.

9. Answering the ninth paragraph, PSE denies the allegations in the ninth paragraph. PSE's records show that a payment was made to PSE on December 31, 2007, in the amount of \$54,600.68. PSE has insufficient information to admit or deny if Ms. Mangat made such payment, but Harbhajan Mangat's name was not on the account for which the payment was made. Accordingly, PSE denies the allegations in the ninth paragraph.

10. Answering the tenth paragraph, PSE neither admits nor denies the tenth paragraph, which does not contain any factual or legal allegations that require an answer.

11. Answering the first sentence of the eleventh paragraph, PSE admits the allegation in the first sentence of the eleventh paragraph. Answering the remainder of the eleventh paragraph, PSE has insufficient information to admit or deny the allegations in the remainder of the eleventh paragraph, and therefore denies the same.

12. Answering the first sentence of the twelfth paragraph, PSE denies the allegation in the first sentence of the twelfth paragraph. PSE issued a refund in the amount of \$1,370.00, not \$1,296.19, on October 24, 2011. Answering the remainder of the twelfth paragraph, PSE admits the remaining allegations in the twelfth paragraph. Exhibit Nos. 6 and 7 to the Complaint speak for themselves.

#### **AFFIRMATIVE DEFENSES**

1. Harbhajan Mangat's Complaint fails to state a claim upon which relief can be granted.

2. PSE's acts and/or practices have fully complied with Washington law, this Commission's rules and PSE's tariffs.

3. This complaint proceeding is not the proper proceeding for a request for reconsideration of a Commission rule.

4. Any order requiring PSE to provide the relief requested in the Complaint would violate Washington law and this Commission's rules and orders prohibiting discriminatory and preferential practices.


**PRAYER FOR RELIEF**

WHEREFORE, PSE prays for the following relief:

- A. That Harbhajan Mangat's Complaint be dismissed.
- B. For such other relief as the Commission deems just and appropriate.

DATED: May 11, 2012

**PERKINS COIE LLP**

By   
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