

Bob Ferguson

ATTORNEY GENERAL OF WASHINGTON

May 30, 2014

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SENT VIA ABC LMI AND E-MAIL

Steven V. King
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 Accounting and Treatment Related to Payments for Major Maintenance Activities, Docket UE-130583

Washington Utilities and Transportation Commission, Complainant, v. PUGET SOUND ENERGY, INC., Respondent, Docket UE-130617

In the Matter of the Petition 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 80.12, Docket UE-131099

In the Matter of the Petition of PUGET SOUND ENERGY, INC., For an Order Authorizing the Sale of Interests in the Development Assets Required for the Construction and Operation of Phase II of the Lower Snake River Wind Facility, Docket UE-131230

Dear Mr. King:

Enclosed for filing in the above-referenced dockets are the original and eight (8) copies of the Joint Motion for Modification of Schedule in Order 06, and the Certificate of Service.

(R)

Sincerely,

Simon ffitch

Senior Assistant Attorney General

Public Counsel Division

(206) 389-2055

Sf:cjb

cc: Service List (Email & U.S. Mail)

CERTIFICATE OF SERVICE

In the Matter of the Petition of Puget Sound Energy, Inc., for an Accounting Order Authorizing Accounting Treatment Related to Payments for Major Maintenance Dockets UE-130583

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**

In the Matter of the Application of Puget Sound Energy, Inc. For an Order Authorizing the Sale of Interests in the Development Assets Required for the Construction and Operation of Phase II of the Lower Snake River Wind Facility Docket No. UE-131230

I hereby certify that a true and correct copy of Joint Motion for Modification of Schedule in Order 06 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: May 30, 2014

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CAROL BAKER Legal Assistant

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of PUGET SOUND ENERGY, INC. For an Accounting Order Authorizing Accounting Treatment Related to Payments for Major Maintenance Activities WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant, v. PUGET SOUND ENERGY, INC. Respondent. In the Matter of the Petition 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 80.12 In the Matter of the Petition of PUGET SOUND ENERGY, INC. For an Order Authorizing the Sale of Interests in the Development Assets Required for the Construction and Operation of Phase II of the Lower

DOCKET UE-130583

DOCKET UE-130617

DOCKET UE-131099

DOCKET UE-131230

JOINT MOTION FOR MODIFICATION OF SCHEDULE IN ORDER 06

Snake River Wind Facility

I. MOTION

- Pursuant to WAC 480-07-385, Puget Sound Energy (PSE), Public Counsel, and Commission Staff, (hereafter Joint Parties) move the Commission for a modification of Order 06 (Appendix A, Settlement Stipulation, ¶ 25) in this docket, as follows: The July 1, 2014, deadline for PSE to initiate a separate docket to address Power Cost Adjustment (PCA) and Power Cost Only Rate Case (PCORC) related issues would be extended 90 days until October 1, 2014, to allow the Joint Parties additional time to review a pending proposal.
- 2. Industrial Customers of NW Utilities (ICNU) has authorized the Joint Parties to represent that it does not oppose the Joint Motion. The Joint Parties and ICNU are the four signatories to the referenced Settlement Stipulation.

II. BACKGROUND

On September 13, 2013, the Joint Parties and ICNU entered into a Settlement Stipulation in PSE's 2013 PCORC filing in which they agreed to participate in a collaborative process to address PCA and PCORC- related issues. The Settlement Stipulation was ultimately approved by the Commission and incorporated by reference in Order 06. The Settlement Stipulation, provided, in pertinent part: "If the Parties reach agreement in the collaborative, that agreement can be implemented in PSE's next PCORC, subject to Commission approval. If the Parties do not reach agreement, PSE agrees to initiate a docket no later than July 1, 2014, to address PCA and PCORC-related issues."

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¹The 2013 PCORC Final Order Approving and Adopting Settlement Agreement resolved four consolidated dockets, as follows: UE-030617, Order 06 (primary PCORC docket); UE-130583, Order 02 (Mint Farm); UE-131099, Order 02 (Electron); and UE-131230, Order 02 (LSR II). For simplicity, the Joint Motion refers to Order 06 in the primary PCORC Docket, UE-130617.

² Order 06, Settlement Stipulation, ¶ 25. JOINT MOTION FOR MODIFICATION OF SCHEDULE IN ORDER DOCKETS UE-130583, UE-130617, UE-131099 AND UE-131230

- As provided in the Settlement Stipulation, beginning in November 2013, the Joint Parties conducted a series of regular collaborative meetings in Seattle and Olympia with participation by Joint Party and ICNU staff members, experts, and counsel. PSE provided information in response to informal Data Requests from parties. The Joint Parties and ICNU have not yet reached consensus on changes, if any, that should be made to PSE's Power Cost Adjustment mechanism or PCORC. Accordingly, no changes are being requested as part of PSE's 2014 PCORC, filed May 23, 2014.
- Flowever, on May 15, 2014, Public Counsel presented a proposal for consideration recommending certain modifications to the PCA mechanism. Other parties expressed sufficient interest in the proposal that additional time for further analysis and consideration was determined to be useful. In order to allow time for this review, the Joint Parties agreed to request a 90-day extension of the July 1, 2014, deadline for PSE to file the separate PCA/PCORC review docket. As part of the agreement, PSE has committed to perform its own analysis of the Public Counsel proposal and to notify all parties by August 15, 2014, if it is open to further exploration of the proposal. Commission Staff has also committed to undertake an initial analysis of the proposal by August 15, 2014.
 - If the Joint Parties agree on August 15 to move forward with additional exploration and discussion of the proposal, the Joint Parties would work towards finalizing an agreement to be filed October 1, 2014, for review by the Commission. Alternatively, if PSE believes that positions are too divergent, it will advise the other parties on August 15 that it plans to proceed with the docket filing on October 1. If agreement is not reached on PCA revisions, PSE's

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October 1 filing would include testimony describing and supporting the existing PCA and PCORC, or proposing its own preferred changes.

- 7. For the foregoing reasons, the Joint Parties believe that the requested extension is in the public interest and will not prejudice any party or the Commission. The Joint Parties respectfully request that the 90 day extension be granted.
 - DATED this 30th day of May, 2014.

ROBERT W. FERGUSON

Attorney General

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Simon J. ffitch

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Counsel for Washington Utilities and **Transportation Commission Staff**

Perkins Coie LLR

SHEREE STROM CARSON by electronic authorization

Attorney for Puget Sound Energy, Inc.