

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PUGET SOUND ENERGY, INC.

For Approval of its March 2015 Power
Cost Adjustment Mechanism Report

DOCKET NO. UE-15____

PETITION OF PUGET SOUND
ENERGY, INC. FOR APPROVAL OF ITS
MARCH 2015 POWER COST
ADJUSTMENT MECHANISM REPORT

1. This Petition is brought by Puget Sound Energy, Inc. ("PSE" or the "Company"). PSE's representative for purposes of this proceeding is:

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and its legal counsel for purposes of this proceeding is:

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2. This Petition brings into issue: WAC 480-07-370(1)(b).

I. BACKGROUND

A. The Company's PCA Mechanism Requires Annual True-Up Filings

3. In the Commission's Twelfth Supplemental Order in Docket Nos. UE-011570 and UG-011571 ("Twelfth Supplemental Order"), the Commission approved the parties' Settlement Stipulation for Electric and Common Issues for PSE's 2001 general rate case ("Stipulation"). Among other things, the Twelfth Supplemental Order authorized a Power Cost Adjustment Mechanism ("PCA Mechanism"). Exhibit A to the Stipulation, which was attached to the Twelfth Supplemental Order, sets forth details regarding the PCA Mechanism, and is hereinafter referred to and cited as the "PCA Settlement." A copy of the PCA Settlement, as revised, is attached to this Petition as Exhibit A.

4. The PCA Settlement describes the PCA Mechanism as

a mechanism that would account for differences in PSE's modified actual power costs relative to a power cost baseline. This mechanism would account for a sharing of costs and benefits that are graduated over four levels of power cost variances

PCA Settlement, ¶ 2. The PCA Settlement sets forth the various levels of costs and benefits sharing between the Company and its customers, and provides that "[t]he customer's share of the power cost variability will be deferred as described below. . . ."

Id. at ¶ 3.

5. In order to implement its sharing provisions, the PCA Settlement requires an annual true-up of actual power costs (versus the normalized level set in rates) and an accounting of sharing amounts, for Commission review and approval. *See Id.* at ¶ 4.

II. PSE'S MARCH 2015 PCA REPORT

6. In compliance with the PCA Settlement and the Sixteenth Supplemental Order in Docket Nos. UE-011570 and UG-011571¹, this Petition presents to the Commission PSE's Power Cost Adjustment Mechanism Annual Report for the Twelve Month Time Period January 1, 2014 through December 31, 2014—PCA Period Thirteen ("PCA Annual Report") for the Commission's review and approval. The PCA Annual Report is being filed along with this Petition.² Also being filed with this Petition are the Prefiled Direct Testimonies of Katherine J. Barnard, with supporting exhibits, and David E. Mills, with supporting exhibits. Accompanying workpapers are also being provided to WUTC Staff, Public Counsel and the Industrial Customers of Northwest Utilities ("ICNU") with this filing. As described below, PSE requests that the Commission approve the PCA Annual Report as filed.

¹ The sixteenth supplemental order changed the annual PCA period to a calendar year rather than a fiscal year and approved an annual submittal date of March 31.

² *See* Second Exhibit to the Prefiled Direct Testimony of Katherine J. Barnard, Exhibit No. ____ (KJB-3).

7. As detailed in the PCA Annual Report, the average power cost rate during PCA Period 13 was \$62.596 per Megawatt hour ("MWh"). From January 1, 2014 through November 30, 2014, the baseline power cost rate was \$60.736 per MWh as established in Docket No. UE-130617. From December 1, 2014 through December 31, 2014, the baseline power cost rate was \$59.819 per MWh. The change to the baseline rate was approved in Docket No. UE-141141, PSE's 2014 Power Costs Only Rate Case ("PCORC"). Actual power costs were higher than the average of the baseline power cost rates in effect during PCA Period 13 by \$40,127,109 (after adjustment for Firm Wholesale).


8. The activity that occurred in PCA Period 13 resulted in a cumulative under-collection of \$4,589,482 (from inception of the PCA through 12/31/2014). PSE's share of this imbalance is \$731,105, with the remaining \$3,858,377 assigned to the customer.

III. REQUESTED ACTION

9. PSE respectfully requests that the Commission issue an order approving PSE's PCA Annual Report, as filed.

DATED: March 31, 2015.

PERKINS COIE LLP

By 
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