

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-072300

Docket No. UG-072301

Docket No. UG-080064

PUGET SOUND ENERGY, INC.'S
MOTION TO CONSOLIDATE AND
AUTHORIZE TARIFF REVISION

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

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1 Puget Sound Energy, Inc. ("PSE" or the "Company") respectfully submits to the Washington Utilities and Transportation Commission ("the Commission") this motion to consolidate Docket No. UG-080064 ("tariff revision") with consolidated Docket Nos. UE-072300 and UG-072301 ("general rate case"). On January 9, 2008, PSE filed a request for authorization to revise its WN U-2 Tariff for natural gas service, 3rd Revision to Sheet No. 3-B – Index, in Docket No. UG-080064. PSE now moves to consolidate its tariff revision with its general rate case. PSE further moves and respectfully requests the Commission to authorize PSE's tariff revision immediately, rather than considering such filing as part of a final order in its general rate case.

2 Consolidation is appropriate in cases in which the facts or legal principles are related. *See* WAC 480-07-320. In its tariff revision, PSE proposes to cancel Schedule 50, Compressed Natural Gas ("CNG") for Vehicle Fuel. PSE's request is appropriate for considering in the context of a general rate case because the facts are related, the legal principles are the

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CONSOLIDATE AND AUTHORIZE TARIFF REVISION - 1

same, and a general rate case is an appropriate context in which to review a tariff revision.

Further, the tariff sheet that is the subject of PSE's tariff revision has been suspended in PSE's general rate case.¹

3 The Commission should also consolidate PSE's tariff revision and its general rate case because, pursuant to the suspension order in PSE's general rate case,² PSE is required to obtain authorization from the Commission before it may change or alter the suspended portions of its tariff during the suspension period in its general rate case. Therefore, it is appropriate for the Commission to consider and approve PSE's tariff revision in the context of PSE's general rate case.

4 PSE requests that the Commission immediately authorize its proposed revision rather than carry the tariff revision along for consideration with more complex issues in its general rate case. In its tariff revision filing, PSE requested an effective date of February 9, 2008. While it is appropriate to consolidate PSE's tariff revision with its general rate case, it is not necessary or reasonable to delay authorization of PSE's tariff revision until a final order is issued in the general rate case. PSE's tariff revision is not a complex issue and should be authorized without unnecessary delay. As described in more detail in PSE's cover letter to Carol Washburn on January 9, 2008 in Docket UG-080064, PSE's Schedule 50 has only three remaining customers, and PSE has already provided notice of its proposed tariff revision, as required by law and Commission rules and regulations. PSE desires to discontinue the service

² *Wash. Utils. & Trans. Comm'n. v. Puget Sound Energy, Inc.*, Docket Nos. UE-072300 and UG-072301 (consolidated), Order No. 1 ¶17 (Dec. 12, 2007).

because (1) CNG service is conveniently available now from other providers that are in the business of providing this service; (2) continuation of this service will require that the Company invest in replacing or upgrading the equipment used for tracking and billing the retail sales; and (3) there are security issues associated with maintaining the only Company location where this service is offered.

5 Consolidation of PSE's tariff revision with its general rate case is appropriate because its tariff revision and general rate case consist of related facts and legal principles. Consolidation is also appropriate because PSE's tariff revision requires Commission authorization since the sheet included in the tariff revisions is among PSE's tariffs that have been suspended. Finally, PSE requests that the Commission immediately authorize PSE's tariff revision because it is not necessary to delay such authorization. Accordingly, PSE respectfully requests that the Commission grant PSE's Motion to Consolidate and Authorize Tariff Revision.

Respectfully submitted this 30 day of January 2008.

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