

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

PUGET SOUND ENERGY

Update and Redevelopment of Electric
Tariff WN U-60, Tariff G for Electric
Service, Schedule 85 - Line Extensions and
Service Lines

DOCKET UE-_____

PETITION FOR EXEMPTION FROM
COMMISSION RULE

I. INTRODUCTION

1 Pursuant to WAC 480-07-110, Puget Sound Energy (“PSE”) respectfully requests that the Washington Utilities and Transportation Commission (“WUTC”) issue an Order exempting PSE from WAC 480-80-105(4)(b), which requires PSE to use specific coding symbols to signify changes to revised tariff sheets. PSE submits this Petition after consultation with WUTC Staff and in response to Staff’s Open Meeting Memorandum dated August 13, 2015, in Docket UE-150200. In support of this Petition, PSE is also submitting the declaration of Mei Cass, Regulatory Project Manager (“Cass Decl.”), as well as a redlined and a clean version of the updated Schedule 85 tariff sheets.

2 PSE is engaged in the business of providing electric and natural gas service within the State of Washington as a public service company and is subject to the regulatory authority of the Commission as to its retail rates, services, facilities and practices. Its full name and mailing address are:

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4 The following rules or statutes may be brought into issue by this Petition:

RCW 80.01.040, RCW 80.28.060, WAC 480-07-105, and WAC 480-80-110.

II. BACKGROUND

5 In Docket UE-150200, PSE committed to update its Schedule 85 Tariff Sheet to revise charges and costs for line extension and service lines and to update margin allowance amounts. These commitments were made in response to WUTC Staff's memorandum in Docket UE-150200, and PSE has worked collaboratively with WUTC Staff since 2015 in preparation for these changes. *See* Cass Decl. at ¶ 3. In addition to substantive changes to Schedule 85's charges and margin allowance amounts, the updates to Schedule 85 tariff sheets include significant format changes and non-substantive changes to text designed to ease readability, improve clarity, and provide logical continuity among different terms and conditions. *See id.* For example, PSE has consolidated redundant text, added numbers to paragraphs when delineating lists, increased line spacing, moved existing text from one heading to another, and capitalized letters in defined words. PSE has worked collaboratively with WUTC Staff regarding

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these non-substantive changes, as well.

6 Pursuant to WAC 480-80-105(4), PSE must use specific symbols to signify tariff revisions. Specifically, PSE must use the coding as follows:

(4) **Tariff symbols.** Each time a tariff sheet(s) is revised, a utility must code all changes with the tariff symbol that best reflects the purpose and effect of the change. A utility:

(a) Must locate the symbols on the right hand side of the changed text directly across from the change;

(b) Must use the following list of symbols to signify:

D - Discontinued rate, service, regulation, or condition;

N - New rate, service, regulation, condition, or sheet;

I - A rate increase;

R - A rate reduction;

C - Changed condition or regulation;

K - That material has been transferred **to** another sheet in the tariff. (A footnote is required on the tariff sheet to identify the material's new sheet number);

M - That material has been transferred **from** another sheet in the tariff. (A footnote is required on the tariff sheet to identify the material's former sheet number);

T - A change in text for clarification;

O - no change. (This symbol is discretionary unless specifically requested by the commission); and

(c) May use additional symbols for other purposes when it has identified the symbols in its tariff as provided for in WAC [480-80-102](#)(3).

PSE has applied the above-referenced coding symbols to all substantive changes to Schedule 85, but for the reasons described below PSE requests an exemption from WAC 480-80-105(4)(b) for the non-substantive revisions to the Schedule 85 tariff sheets. *See id.* at ¶ 4.

III. REQUEST FOR EXEMPTION

A. An Exemption is Necessary to Improve the Readability of Schedule 85.

7 Because of the large number and extensive scope of non-substantive revisions to the Schedule 85 tariff sheets, PSE is unable to comply with the coding requirements in WAC 480-80-105 without substantial effort and without creating tariff sheets that are virtually unreadable. *See* Cass Decl. at ¶ 4. A redlined version of Schedule 85 containing

all substantive and non-substantive changes is attached as Exhibit A to the Declaration of Mei Cass. If PSE were to code all changes to the Schedule 85 tariff sheets as required by WAC 480-80-105(4), it would negate the improvements in readability and clarity that PSE is undertaking with the changes themselves. *See id.* at ¶ 5.

8 Instead of applying the coding symbols required in WAC 480-80-105(4), PSE requests that the Commission issue an order exempting PSE from WAC 480-80-105(4)(b) and allowing PSE to code all reorganization and format-related changes with the tariff symbol “T”. Such exemption would still notify the reader that text has been reorganized, but it will allow PSE to forego designating that same text with a “K” for material that has moved **to** another sheet in the tariff and “M” for material that has moved **from** another sheet in the tariff. Without such exemption, text that has been changed for clarification and moved to another sheet in the tariff would require three codes: T, K, and M. Because of the number and extent of non-substantive changes, this could create tariff sheets that are more confusing and unclear after revision than before they were revised. *See id.* at ¶ 7. PSE does not propose that an exemption apply to substantive tariff revisions, however, and PSE will code all revisions regarding rates, services, conditions, or regulations pursuant to WAC 480-80-105(4)(b). *See id.*

B. An Exemption is in the Public Interest.

9 Pursuant to WAC 480-07-110 the Commission is authorized to grant PSE an exemption from Commission rule if such exemption is consistent with the public interest, the purposes underlying regulation, and applicable statutes. The Commission should grant PSE’s request for an exemption of WAC 480-80-105(4)(b) because such exemption is in the public interest and does not conflict with the purposes of the underlying regulation or

applicable statutes. The exemption is necessary to allow PSE to update and redevelop its Schedule 85 tariff sheets in a manner that improves its readability and clarity, thereby facilitating public access and comprehension of PSE's Schedule 85 tariff sheets. On the other hand, requiring PSE to comply with WAC 480-80-105(4)(b) would impede public understanding of PSE's tariff and conflict with the purpose of the underlying regulation.

IV. CONCLUSION

10 For the reasons set forth in this Petition, PSE respectfully requests that the Commission issue an order exempting PSE from the coding requirements of WAC 480-80-105(4)(b) and allowing PSE to code all reorganization and format-related changes with the tariff symbol "T" for updating and redeveloping PSE's Electric Tariff WN U-60, Schedule 85 - Line Extensions and Service Lines Tariff.

DATED this 31st day of January, 2018.

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