

Puget Sound Energy P.O. Box 97034 Bellevue, WA 98009-9734 PSE.com

September 17, 2018

Filed Via Web Portal

Mr. Mark L. Johnson, Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Re: <u>Annual Comprehensive Natural Gas Hedging Plan</u>

Dear Mr. Johnson:

Puget Sound Energy ("PSE") hereby submits its Annual Comprehensive Hedging Plan ("Plan") as required by the Policy and Interpretive Statement on Natural Gas Hedging Practices in Docket UG-132019. This Plan is being submitting concurrently with PSE's annual PGA filing.

The Plan describes PSE's incorporation of risk-responsive hedging strategies for the November 1, 2018 through October 31, 2019 PGA-year and beyond. Contained within this Plan is a description of PSE's hedging objectives and approach to addressing the basic elements of risk-responsive hedging, including objectives and goals, exposure quantification, strategic initiatives, and oversight and control. The Plan also includes a retrospective hedging report.

Additionally, pursuant to WAC 480-07-160, the Company requests that the enclosed Annual Comprehensive Natural Gas Hedging Plan Report be accorded Confidential treatment because it contains valuable commercial information, including confidential cost and financial information. In accordance with WAC 480-07-160, the pages containing confidential information submitted herewith have been marked with "Designated Information is Confidential per WAC 480-07-160".

Questions regarding this submission can be directed to Paul Schmidt at (425) 462-3180. If you have any other questions, or if I can be of any assistance, please contact me at (425) 456-2142.

Sincerely,

/s/Jon Pílíarís

Jon Piliaris Director, Regulatory Affairs Puget Sound Energy PO Box 97034, EST-07W Bellevue, WA 98009-9734 425-456-2142 Jon.Piliaris@pse.com

cc: Lisa Gafken - Public Counsel, Sheree Carson - Perkins Coie, Edward Finklea Attachment: Annual Comprehensive Natural Gas Hedging Plan

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