



Puget Sound Energy  
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COMMISSION

October 14, 2020

***Filed via Web Portal***

Mr. Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503

**Re: Petition for an Order Authorizing the Application and Amortization of Deferred Liquidated Damages under Schedule 139 Voluntary Long Term Renewable Energy Purchase Rider; UE-20 \_\_\_\_\_**

Dear Mr. Johnson:

Enclosed for filing please find the following documents submitted on behalf of Puget Sound Energy ("PSE"):

1. Petition of Puget Sound Energy for an Order Authorizing the Application and Amortization of Deferred Liquidated Damages under Schedule 139 Voluntary Long Term Renewable Energy Purchase Rider; and
2. Certificate of Service.

This petition represents a subsequent filing under WAC 480-07-885. It is being filed to implement the instructions in Paragraph 454 in Final Order No. 08 in UE-190529, et al. Paragraph 454 required PSE to bring its proposal for the application of deferred liquidated damages to the Commission for consideration. PSE and the project owner, entered into a Letter Agreement in July, 2020. This Agreement set a maximum LD amount, which has been reached. No further LD's will be collected. The method for applying the liquidated damages was brought to the Commission under PSE's Schedule 139 Tariff filing under Docket UE-200817. This petition allows for the full proposal of application and amortization of the deferred liquidated damages to be presented.

PSE has been in communication with all of the Schedule 139 Green Direct customers regarding project delays, the collection of liquidated damages, and the use of liquidated damages to purchase Renewable Energy Credits on their behalf. Prior to filing updated rates, PSE was able to connect with a selection of Green Direct customers, including its largest customer. Since filing, PSE has been meeting with all of the Phase 1 Green Direct customers to discuss the changes. Customers have expressed enthusiasm regarding the proposed solution.

PSE requests confidential treatment for parts of pages 3 and 4 of the petition under RCW 80.04.095 and in accordance with WAC 480-07-160. The information labeled as confidential

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includes third quarter 2020 confidential financial information related to liquidated damages, which could expose PSE to competitive injury if disclosure is unrestricted prior to the information becoming public. Actual amounts for the third quarter 2020 require confidential treatment until PSE's financial results are published in its Form 10Q which is expected to be November 4, 2020, at which time the confidential designation for third quarter amounts is no longer necessary. Therefore, PSE requests confidential treatment on the basis that the information labeled "Shaded Information is Designated as Confidential per WAC 480-07-160" contains "confidential financial information," as provided in in RCW 80.04.095 in accordance with WAC 480-07-160(2)(c).

Please direct any questions regarding this filing to Stacy Smith at (425) 457-5854 or [stacy.smith@pse.com](mailto:stacy.smith@pse.com). If you have any other questions please contact me at (425) 456-2105.

Sincerely,

*/s/ Susan Free*

Susan E. Free  
Di of Revenue Requirements and Regulatory Compliance  
Puget Sound Energy  
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cc: Sheree Carson, Perkins Coie  
Lisa Gafken, Public Counsel  
Sally Brown, WUTC Staff

Attachments: Petition for Accounting Order  
Certificate of Service