

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

Reducing the Administrative Burden in
Support of the Commission's Ongoing
Inquiry into the Adequacy of the Current
Regulatory Framework

DOCKET U-210151

ORDER 01

AMENDING FILING REQUIREMENTS
FOR AVISTA CORPORATION d/b/a
AVISTA UTILITIES, CASCADE
NATURAL GAS CORPORATION,
NORTHWEST NATURAL GAS
COMPANY d/b/a NW NATURAL,
PACIFICORP d/b/a PACIFIC POWER &
LIGHT COMPANY, AND PUGET
SOUND ENERGY

BACKGROUND

- 1 On March 4, 2021, the Washington Utilities and Transportation Commission (Commission) initiated an inquiry into reducing the administrative burden to review the recurring filings utilities are obligated to make with the Commission by statute, rule, or order. The purpose of the inquiry is to determine which filings are no longer necessary or could be consolidated.
- 2 On March 15, 2021, the Commission issued a Notice of Opportunity to File Written Comments asking investor-owned utilities to complete a template with information regarding recurring filings required by statute, rule, or Commission order and to recommend an action for each filing. By April 15, 2021, the Commission received responses from each of its regulated utilities.¹
- 3 On April 27, 2021, the Commission issued a Notice of Opportunity to File Written Comments inviting parties to respond to each utility's recommended modifications to the reporting requirements identified in the utility responses to the Notice dated March 15, 2021.

¹ On May 14, 2021, Cascade filed a revised version of the comments it filed on April 7, 2021.

- 4 On May 25, 2021, the Commission received written comments from The Energy Project, Public Counsel, and Northwest Energy Coalition. Commission Staff (Staff) filed comments on May 28, 2021. Staff reviewed the utility recommendations and interested party responses to the Notice dated April 27, 2021. Staff compiled a list of filings that appeared to Staff to be the best candidates for elimination or a reduction in filing frequency. Staff then decided to offer its proposed modifications to filings required by order as a first step before moving on to filings required by rule.
- 5 On May 9, 2023, the Commission issued a Notice of Opportunity to File Written Comments inviting interested parties to respond to Staff’s proposed modifications to filings required by order. Staff’s proposed modifications were provided as Appendix A to the Notice. On or by June 15, 2023, the Commission received responses from Avista Corporation d/b/a Avista Utilities (Avista), Puget Sound Energy, Northwest Natural Gas Company d/b/a NW Natural (NW Natural), and PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp).
- 6 Through this effort, Staff has identified approximately 80 utility filings that are required by order. Of those 80 filings, Staff has proposed modifications to only seven. According to Staff, the initial list of 80 filings was reduced to seven for a variety of reasons. Staff excludes some filings as candidates for elimination or consolidation because those filings were no longer required, either because the filing requirement expired or because it was eliminated by order in another proceeding.² Staff excludes other filings because it is unclear how (or whether) the report would be used within the evolving context of utility performance metrics. However, Staff excludes most filings as candidates because the information they contain continues to be used for specific regulatory purposes or because most of the commenting parties recommended that the filing requirement be maintained.
- 7 The seven modifications Staff proposes – which were provided as Appendix A to the Commission’s May 9, 2023, Notice of Opportunity to File Written Comments – are summarized in Table 1 below.

² See, e.g., *WUTC v. Puget Sound Energy*, Dockets UE-220066, UG-220067, and UG-210918 (consolidated), Order 24/10, Appendix A, 28 ¶ 56 (December 22, 2022).

TABLE 1. Summary of Staff’s Proposed Modifications to Utility Filings Required by Order

REPORT	COMPANY	STAFF RECOMMENDS	REASON
Annual Report of Permanent Disconnections and Removal of Facilities ³	PacifiCorp	Eliminate Reporting Requirement	Information is not used; report is not required for any other utility.
Annual Environmental Remediation Deferral Report ⁴	PacifiCorp	Eliminate Reporting Requirement	Not useful as a standalone report; information provided upon request for cost recovery.
Biennial Pipeline Replacement Plan ⁵	NW Natural	Eliminate Reporting Requirement	Plan is unnecessary for utilities that do not have high-risk pipe.
Updates to Annual Pipeline Replacement CRM Tariff Revision ⁶	Cascade	Eliminate Required Updates	Unnecessary to provide cost updates after initial filing given the true-up function of the CRM.
PCAM Quarterly Report ⁷	PSE	Modify Frequency to Annual	PCAM deferrals are reviewed annually; quarterly reporting is unnecessary.
Decoupling Mechanism Quarterly Report ⁸	Avista	Modify Frequency to Annual	Decoupling review is annual; quarterly reporting is unnecessary.
ERM Deferral Monthly Report ⁹	Avista	Modify Frequency to Annual	ERM deferrals are reviewed annually; monthly reporting is unnecessary.

³ Docket UE-001734, 8th Suppl. Order, 30 ¶ 95 (approving Modified Tariff Proposal). *See also* 8th Suppl. Order at 7 ¶¶ 22-23 (referencing McIntosh Exh. 301T at 8:8-13), identifying that this reporting requirement is a condition of the Modified Tariff proposal.

⁴ Docket UE-031658, Order 03, 3 ¶ 11, modifying the frequency of the reporting requirement established by Docket UE-031658, Order 01, from semi-annual to annual.

⁵ Docket UG-120715, Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk, 11 ¶¶ 41-43 (December 31, 2012).

⁶ Docket UG-120715, Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk, 17 ¶ 69 (December 31, 2012).

⁷ Docket UE-130617, Order 11, approving settlement at ¶¶ 38-39. This reporting requirement was established by the Settlement Stipulation, Attachment A at 2 ¶ 3c.

⁸ Dockets UE-140188 and UG-140189, Order 05, approving settlement at 24 ¶ 74. The Settlement adopted Avista’s proposal on decoupling, including quarterly reporting, as discussed in Ehrbar Exh. PBE-1T at 67:12-16 and 73:8-9.

⁹ Docket UE-011595, 5th Suppl. Order, approving settlement at 22 ¶ 67. The Settlement Stipulation identifies this reporting requirement at 6 ¶ 4a.

8 In response to the Commission's May 9, 2023, Notice for Opportunity to File Written
Comments, the Commission received comment from four parties: Avista, PSE, NW
Natural, and PacifiCorp. The Commission did not receive comment from Cascade or any
non-company party. No party responded in opposition to Staff's proposed modifications
to the filing requirements in Appendix A.

9 Given that no party commented in opposition to Staff's proposed modifications, Staff
recommends that the Commission enter an order adopting those modifications.

DISCUSSION

10 The Commission agrees with Staff that Staff's proposed modifications to the filing
requirements of Avista, PSE, NW Natural, PacifiCorp, and Cascade contained in
Appendix A to the Commission's Notice dated May 9, 2023, should be adopted as
proposed.

11 Considering the comments received from Avista, PSE, NW Natural, and PacifiCorp, in
response to the Notice dated May 9, 2023, and considering none of the interested parties
filed comments in opposition to Appendix A, the Commission agrees with Staff's
recommendations to:

- (1) Eliminate the requirement, established in the 8th Supplemental Order of Docket UE-001734 (approving the Modified Tariff Proposal in that docket), that PacifiCorp file annually a Report of Permanent Disconnections and Removals of Facilities;
- (2) Eliminate the requirement, established in Order 03 of Docket UE-031658, that PacifiCorp file annually a Report of Environmental Remediation Cost Deferrals;
- (3) Modify the requirement that natural gas utilities must file a pipe replacement program plan every two years, established in the Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk in Docket UG-120715, to pertain only to natural gas utilities that own pipeline identified as having an elevated risk of failure.
- (4) Eliminate the requirement, established in the Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk in Docket UG-120715, that

utilities filing an annual cost recovery mechanism tariff filing must update projected costs twice between the initial filing and the rate-effective date;

- (5) Modify the requirement that Puget Sound Energy file quarterly a PCA Report, established in Order 11 of Docket UE-130617 (approving the Settlement Stipulation in that docket), from a quarterly filing frequency to an annual filing frequency;
- (6) Modify the requirement that Avista file a monthly ERM Deferral Report, established in the 5th Supplemental Order of Docket UE-011595 (approving the Settlement Stipulation in that docket), from a monthly filing frequency to an annual filing frequency; and
- (7) Modify the requirement that Avista file a Decoupling Mechanism Quarterly Report, established in Order 05 of Dockets UE-140188 and UG-140189 (approving the Settlement Stipulation in that docket), from a quarterly filing frequency to an annual filing frequency.

We find that Staff's proposed revisions are reasonable and will reduce administrative burden. Accordingly, we determine that it is in the public interest to amend the filing requirements as set forth above.

FINDINGS AND CONCLUSIONS

- 12 (1) The Commission is an agency of the State of Washington vested by statute with the authority to regulate the rates, regulations, practices, accounts, and affiliated interests of public service companies, including electric companies and natural gas companies.
- 13 (2) Avista Corporation d/b/a Avista Utilities is engaged in the business of providing electric and natural gas services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 14 (3) Cascade Natural Gas Corporation is engaged in the business of providing natural gas services within the state of Washington and is a public service company subject to Commission jurisdiction.

- 15 (4) Northwest Natural Gas Company d/b/a NW Natural is engaged in the business of providing natural gas services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 16 (5) PacifiCorp d/b/a Pacific Power & Light Company is engaged in the business of providing electric services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 17 (6) Puget Sound Energy is engaged in the business of providing electric and natural gas services within the state of Washington and is a public service company subject to Commission jurisdiction.
- 18 (7) This matter came before the Commission at its regularly scheduled meeting on March 14, 2024.
- 19 (8) After review of the Notices of Opportunity to File Written Comments, filed on March 15, 2021, April 27, 2021, and May 9, 2023, and subsequently filed comments and giving due consideration, the Commission adopts Commission Staff's recommendations as follows:
- (1) Eliminate the requirement, established in the 8th Supplemental Order of Docket UE-001734 (approving the Modified Tariff Proposal in that docket), that PacifiCorp file annually a Report of Permanent Disconnections and Removals of Facilities;
 - (2) Eliminate the requirement, established in Order 03 of Docket UE-031658, that PacifiCorp file annually a Report of Environmental Remediation Cost Deferrals;
 - (3) Modify the requirement that natural gas utilities must file a pipe replacement program plan every two years, established in the Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk in Docket UG-120715, to pertain only to natural gas utilities that own pipeline identified as having an elevated risk of failure.
 - (4) Eliminate the requirement, established in the Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk in Docket UG-120715, that utilities filing an annual cost recovery

mechanism tariff filing must update projected costs twice between the initial filing and the rate-effective date;

- (5) Modify the requirement that Puget Sound Energy file quarterly a PCA Report, established in Order 11 of Docket UE-130617 (approving the Settlement Stipulation in that docket), from a quarterly filing frequency to an annual filing frequency;
- (6) Modify the requirement that Avista file a monthly ERM Deferral Report, established in the 5th Supplemental Order of Docket UE-011595 (approving the Settlement Stipulation in that docket), from a monthly filing frequency to an annual filing frequency; and
- (7) Modify the requirement that Avista file a Decoupling Mechanism Quarterly Report, established in Order 05 of Dockets UE-140188 and UG-140189 (approving the Settlement Stipulation in that docket), from a quarterly filing frequency to an annual filing frequency.

ORDER

THE COMMISSION ORDERS:

- 20 (1) The recommendations to eliminate or consolidate reporting requirements as proposed in Appendix A to the Commission's May 9, 2023, Notice for Opportunity to File Written Comments, and contained in paragraph 19 of this Order, are reasonable and will reduce administrative burden and may go into effect on March 14, 2024.
- 21 (2) The Commission authorizes the Commission Secretary to accept by letter a filing that complies with the requirements of this Order.

- 22 (3) The Commission retains jurisdiction over the subject matter and the utilities listed in this Order to effectuate the provisions of this Order.

DATED at Lacey, Washington, and effective March 14, 2024.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DAVID W. DANNER, Chair

ANN E. RENDAHL, Commissioner

MILTON H. DOUMIT, Commissioner