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November 3, 2023

Kathy Hunter
Acting Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: 2023 Natural Gas Schedule 111 Climate Commitment Act Compliance Filing, on behalf
of Puget Sound Energy
Docket UE-230470

Dear Ms. Hunter:

On August 3, 2023, the Washington Utilities and Transportation Commission (Commission) entered Order No. 01 (Order or Order 01) in Docket UG-230470 regarding proposed tariff revisions by Puget Sound Energy (PSE or Company) related to the Washington State Climate Commitment Act (CCA). Order 01 allowed PSE's proposed tariff revisions to become effective, subject to conditions, which include the Company developing and proposing a risk-sharing mechanism to balance compliance risks between the Company and its natural gas customers.

On October 31, 2023, PSE submitted a compliance filing in Docket UG-230470, PSE's 2023 Natural Gas Schedule 111 CCA Tariff Filing. Commission Staff believes the compliance filing fails to meet the intended requirements of Order 01, paragraph 22. Staff believes that the "October filing" in paragraph 22 referred to the Company's upcoming tariff revision petition that the Company discussed during the July 21, 2023 recessed open meeting, not a separate compliance filing. Staff therefore expects to see the risk sharing mechanism proposal included in that future filing.

Sincerely,

/s/ *Nash Callaghan*, WSBA No. 49682
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