



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

August 30, 2019

***Filed Via Web Portal***

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

**Re: Puget Sound Energy - Annual Comprehensive Hedging Plan**

Received  
Records Management  
08/30/19 16:56  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

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. The Plan describes PSE’s incorporation of risk-responsive hedging strategies for the November 1, 2019 through October 31, 2020 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 and Attachment A 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 “Shaded information is designated as confidential per WAC 480-07-160”.

Questions regarding this filing can be directed to Elena Zakharova at (425) 462-3539. If you have any other questions, or if I can be of any assistance, please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon Piliaris*

Jon Piliaris  
Director, Regulatory Affairs  
Puget Sound Energy / PO Box 97034 / EST-07W  
Bellevue, WA 98009-9734 / 425-456-2142  
[Jon.Piliaris@pse.com](mailto:Jon.Piliaris@pse.com)

cc: Lisa Gafken, Public Counsel  
Sheree Carson, Perkins Coie

Attachments: Annual Comprehensive Hedging Plan  
Attachment A