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November 24, 2015

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Mr. Steven V. King
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

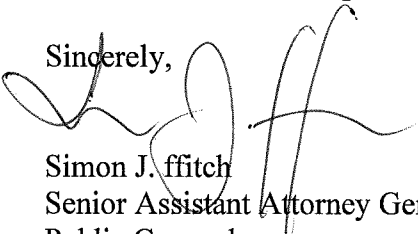
Re: *In the Matter of the Petition of PUGET SOUND ENERGY, INC. for (i) Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc. and (ii) a Declaratory Order Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas Services,*
Docket UG-151663

Dear Mr. King:

Enclosed please find the original and one (1) copy each of the Confidential and Redacted versions of Public Counsel's Memorandum of Law Regarding Jurisdiction, together with a Certificate of Service for filing in the above-referenced docket.

Please note the Memorandum is designated Confidential per Protective Order in Docket UG-151663, as well as per WAC 480-07-160.

Sincerely,


Simon J. Ffitch
Senior Assistant Attorney General
Public Counsel
(206) 389-2055

SJf:cm
Enclosures

cc: Service List (via E-mail & U.S. First Class Mail)
ALJ Dennis J. Moss (via E-mail Only)

CERTIFICATE OF SERVICE

DOCKET UG-151663

Petition of Puget Sound Energy, Inc. for (i) Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc. and (ii) a Declaratory Order Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas Services

I, Chanda Mak, do hereby certify that I have this day served a true and correct copy of *Public Counsel's Memorandum of Law Regarding Jurisdiction* to all parties of record listed and by the manner indicated below:

SERVICE LIST

HC = Receive Highly Confidential; C = Receive Confidential; NC = Receive Non-Confidential

<p>COMMISSION STAFF:</p> <p>Patrick Oshie Brett P. Shearer Assistant Attorneys General Utilities and Transportation Division 1400 S. Evergreen Park Drive S.W. P.O. Box 40128 Olympia, WA 98504-0128 poshie@utc.wa.gov bshearer@utc.wa.gov <input type="checkbox"/> via ABC Legal Messenger <input type="checkbox"/> via FedEx Overnight Delivery <input checked="" type="checkbox"/> via U.S. First-Class Mail <input type="checkbox"/> via Hand-Delivery <input checked="" type="checkbox"/> via E-Mail</p>	<p>PUGET SOUND ENERGY:</p> <p>Kenneth S. Johnson Directory, State Regulatory Affairs P.O. Box 97034 Bellevue, WA 98009-9734 ken.s.johnson@pse.com</p> <p><input type="checkbox"/> via ABC Legal Messenger <input type="checkbox"/> via FedEx Overnight Delivery <input checked="" type="checkbox"/> via U.S. First-Class Mail <input type="checkbox"/> via Hand-Delivery <input checked="" type="checkbox"/> via E-Mail</p>
<p>PUGET SOUND ENERGY:</p> <p>Jason Kuzma Pamela J. Anderson Perkins Coie, LLP The PSE Building 10885 N.E. Fourth Street, Suite 700 Bellevue, WA 98004-5579 jkuzma@perkinscoie.com pjanderson@perkinscoie.com</p> <p><input type="checkbox"/> via ABC Legal Messenger <input type="checkbox"/> via FedEx Overnight Delivery <input checked="" type="checkbox"/> via U.S. First-Class Mail <input type="checkbox"/> via Hand-Delivery <input checked="" type="checkbox"/> via E-Mail</p>	<p>NORTHWEST INDUSTRIAL GAS USERS (NWIGU):</p> <p>Ed Finklea Executive Director Northwest Industrial Gas Users 545 Grandview Drive Ashland, OR 97520 efinklea@nwigu.org</p> <p><input type="checkbox"/> via ABC Legal Messenger <input type="checkbox"/> via FedEx Overnight Delivery <input checked="" type="checkbox"/> via U.S. First-Class Mail <input type="checkbox"/> via Hand-Delivery <input checked="" type="checkbox"/> via E-Mail</p>

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DATED: November 24, 2015.



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Legal Assistant