

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Request of  
  
PUGET SOUND ENERGY,  
  
Petitioner,  
  
For Less Than Statutory Notice in  
Connection with Tariff Revisions

DOCKET UG-200673

ORDER 01

GRANTING LESS THAN  
STATUTORY NOTICE;  
ALLOWING TARIFF REVISIONS  
TO BECOME EFFECTIVE

**BACKGROUND**

- 1 On July 21, 2020, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) revisions to its currently effective Tariff Schedule 129, Low Income Program. The purpose of this filing is to increase the spending limit for the PSE's electric Crisis Affected Customer Assistance Program (CACAP) from \$7.8 million to \$12.3 million and remove the combined electric and gas cap for CACAP. The filing also establishes an end date for the CACAP of September 30, 2020.
- 2 On July 27, PSE provided a substitute filing in this docket to correct an error in the original cover letters and to update the tariff sheet coding.
- 3 The Commission approved PSE's CACAP on April 10, 2020.<sup>1</sup> CACAP allows PSE customers facing financial hardship due to COVID-19 pandemic to apply for bill assistance up to \$1,000. The program utilizes the unspent balance in PSE's Home Energy Lifeline Program (HELP) that was collected from Schedule 129 rates prior to September 30, 2019. The CACAP funding is currently capped at \$7.8 million for electric service and \$7.0 million for natural gas service, but overall CACAP spending across both electric and natural gas service is capped at \$11.0 million.<sup>2</sup>
- 4 PSE reports that as of July 16, 2020, the CACAP has distributed \$4.3 million in electric benefits and \$1.3 million in natural gas benefits. The Company projects that it would

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<sup>1</sup> *Wash. Utils. & Transp. Comm'n v. Puget Sound Energy*, Dockets UE-200331 & UG-200332, Order 01 (Apr. 10, 2020).

<sup>2</sup> The caps were tailored based on the PSE HELP balances as of September 30, 2019. PSE had \$7.9 million electric HELP balance and \$14.5 million natural gas HELP balance, a total of \$22.4 million.

need a total of \$12.3 million for electric benefits in order to make the CACAP available to qualifying customers through September 30, 2020. Therefore, in addition to proposing to increase the electric CACAP funding by \$4.5 million, PSE also proposes removing the combined electric and natural gas cap, currently set at \$11.0 million, as the individual spending caps for electric and natural gas together already function as an overall cap.

5 PSE does not propose to change CACAP eligibility criteria or the calculation of CACAP benefits.<sup>3</sup> PSE also does not propose to increase Schedule 129 rates at this time as PSE expects electric HELP funds will continue to be available through the current program year.<sup>4</sup> PSE intends to maintain the current HELP program year electric fund allocated to Community Action Agencies.

6 RCW 80.28.060 and WAC 480-80-121 require public service companies to provide 30 days' notice to the Commission prior to the proposed effective date of any tariff filing. The tariff sheet filed by PSE on July 21, 2020, bears an effective date of August 20, 2020, which recognizes the required 30-day statutory notice. The Company, however, requests less than statutory notice as permitted by WAC 480-80-122, which would allow the revisions become effective on July 31, 2020. PSE requests less than statutory notice so that the proposed modifications of CACAP can become effective before the end of July, at which point the Governor's Proclamation 20-23, which provides the Commission's authority over this matter, expires.<sup>5</sup>

7 Commission Staff (Staff) has reviewed this filing and believes the extension of the CACAP and the removal of the combined spending cap are justified. The COVID-19 pandemic continues to create financial hardship for many of PSE's customers, and the July 25 expiration of benefits available through the Federal Pandemic Unemployment Program is likely to make the situation worse. PSE's CACAP has provided essential financial assistance for COVID-affected customers in an efficient manner since April, so far having provided benefits to close to 10,000 households with more than 9,000 additional applications pending. PSE has discussed the proposed modifications with stakeholders at the last two advisory group meetings. Commission Staff, The Energy Project, the Public Counsel Unit of the Attorney General's Office, and the NW Energy Coalition do not oppose this filing.

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<sup>3</sup> The benefit will continue to be based on the total bill from March through August 2019, up to \$1,000 maximum benefit. A customer's monthly income must be at or below 250 percent of the federal poverty line to qualify for CACAP.

<sup>4</sup> The total spending for the gas CACAP is unlikely to exceed the original \$7 million cap. PSE will address the carry-over gas HELP funds in a separate future filing if necessary.

<sup>5</sup> See Proclamation of the Governor Amending Proclamation 20-05; 20-25 Stay Home – Stay Healthy (March. 23, 2020).

8 Staff also believes that in order to ensure CACAP benefits will continue to be available to customers in need, the proposed tariff revision should be approved by the Commission and in effect prior to the expiration of Proclamation 20-23 at the end of July.

### DISCUSSION

9 The Commission agrees with Staff that allowing the proposed tariff revisions to become effective with less than statutory notice is reasonable and appropriate. The Commission recognizes the economic hardship many of PSE's customers are facing, and will continue to face, due to the COVID-19 pandemic. We believe that increasing the spending cap for CACAP and authorizing an extension of the program through September 30, 2020, are both justified and decidedly in the public interest.

10 Pursuant to RCW 80.28.060 and WAC 480-80-122, the Commission may allow tariff changes, for good cause shown, without requiring 30 days' notice by order specifying the changes to be made and the time when the Order shall take effect. Here, we appreciate the time-sensitive nature of PSE's proposed revisions to CACAP given the expiration of Proclamation 20-23 at the end of the month and find good cause for allowing the revisions to become on less than statutory notice. We thus grant PSE's request for the tariff revisions to become effective on less than statutory notice.

### FINDINGS AND CONCLUSIONS

- 11 (1) The Commission is an agency of the State of Washington vested by statute with the authority to regulate the rates, regulations, practices, accounts, securities, transfers of property and affiliated interests of public service companies, including natural gas companies.
- 12 (2) Puget Sound Energy is a natural gas company and a public service company subject to Commission jurisdiction.
- 13 (3) This matter came before the Commission at its regularly scheduled meeting on July 30, 2020.
- 14 (4) Staff has reviewed Puget Sound Energy's request in Docket UG-200673 and recommends the Commission approve the proposed tariff revisions. Staff further recommends the Commission grant the Company's request for less than statutory notice.

- 15 (5) Puget Sound Energy is subject to RCW 80.28.060, WAC 480-80-121, and WAC 480-90-194, which require gas companies to file changes in any rate, charge or service with 30 days' notice to the Commission and its customers. For good cause shown, however, the Commission may allow changes without requiring 30 days' notice by order specifying the changes to be made and the time when it shall take effect.<sup>6</sup>
- 16 (6) Based on the COVID-19 pandemic and resulting state of emergency, as well as the possible expiration of Proclamation 20-23 at the end of July, the Commission finds good cause to allow the tariff revisions filed by Puget Sound Energy on July 21, 2020, to become effective with less than statutory notice on July 31, 2020.

### ORDER

#### THE COMMISSION ORDERS:

- 17 (1) Puget Sound Energy's request for less than statutory notice is granted.
- 18 (2) Puget Sound Energy is directed to file a revised tariff page with an effective date of July 31, 2020.<sup>7</sup>
- 19 (3) The tariff revisions Puget Sound Energy filed on July 21, 2020, will become effective on July 31, 2020.

20 The Commissioners, having determined this Order to be consistent with the public interest, directed the Secretary to enter this Order.

DATED at Lacey, Washington, and effective July 30, 2020.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARK L. JOHNSON  
Executive Director and Secretary

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<sup>6</sup> WAC 480-80-122

<sup>7</sup> WAC 480-80-121(3).