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Ms. Amanda Maxwell, Executive Director and Secretary
 Washington Utilities and Transportation Commission
 621 Woodland Square Loop SE
 Lacey, WA 98503

**RE: Advice No. 2023-18
 Puget Sound Energy’s Electric Tariff Revision**

Dear Ms. Maxwell:

Pursuant to RCW 80.28.060, and WAC 480-80-101 and -105, please find enclosed for filing the following proposed revisions to the WN U-60, tariff for electric service of Puget Sound Energy (“PSE” or the “Company”):

| | | |
|--------------------------|-----------------|---|
| 4 th Revision | Sheet No. 551 | Electric Vehicle Non-Residential Charging Products and Services |
| 2 nd Revision | Sheet No. 551-A | Electric Vehicle Non-Residential Charging Products and Services (Continued) |
| 1 st Revision | Sheet No. 551-B | Electric Vehicle Non-Residential Charging Products and Services (Continued) |
| Original | Sheet No. 551-C | Electric Vehicle Non-Residential Charging Products and Services (Continued) |
| Original | Sheet No. 551-D | Electric Vehicle Non-Residential Charging Products and Services (Continued) |
| Original | Sheet No. 551-E | Electric Vehicle Non-Residential Charging Products and Services (Continued) |
| Original | Attachment “A” | Non-Residential Service Agreement (PSE-Owned) to Schedule 551 |
| Original | Attachment “B” | Non-Residential Service Agreement (Host-Owned) to Schedule 551 |
| 3 rd Revision | Sheet No. 552 | Electric Vehicle Residential Charging Products and Services |
| 3 rd Revision | Sheet No. 552-A | Electric Vehicle Residential Charging Products and Services (Continued) |
| 2 nd Revision | Sheet No. 552-B | Electric Vehicle Residential Charging Products and Services (Continued) |

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|--------------------------|-----------------|---|
| 1 st Revision | Sheet No. 552-C | Electric Vehicle Residential Charging Products and Services (Continued) |
| 1 st Revision | Sheet No. 552-D | Electric Vehicle Residential Charging Products and Services (Continued) |
| Original | Sheet No. 552-E | Electric Vehicle Residential Charging Products and Services (Continued) |
| Original | Sheet No. 557 | Electric Vehicle Technology Demonstration |
| Original | Sheet No. 557-A | Electric Vehicle Technology Demonstration (Continued) |
| 2 nd Revision | Sheet No. 583-B | Electric Vehicle Charging Products and Services (Continued) |
| 2 nd Revision | Sheet No. 583-C | Electric Vehicle Charging Products and Services (Continued) |
| 2 nd Revision | Sheet No. 583-D | Electric Vehicle Charging Products and Services (Continued) |
| 1 st Revision | Sheet No. 583-E | Electric Vehicle Charging Products and Services (Continued) |

Purpose of Filing and Background

The purpose of this tariff filing is to propose enhanced electric vehicle supply equipment (“EVSE”) and transportation electrification (“TE”) products and services to meet expanding customer expectations. The proposed changes including revisions to several existing TE tariff schedules and adding a new tariff schedule to complement the TE products and services that have been approved by the Washington Utilities and Transportation Commission under Docket UE–220294 on May 26, 2022. PSE believes that these proposed changes and the new addition will further accelerate the transition to a cleaner energy future and advance transportation electrification in Washington State as detailed in the Company’s 2021-2026 Transportation Electrification Plan (“TEP”) and the associated addendum, which was acknowledged by the Washington Utilities and Transportation Commission¹.

PSE is committed to creating a better and cleaner energy future and supporting Washington State’s clean energy goals. This commitment includes transforming PSE’s electricity supply to become carbon-free by 2045. In the Company’s “Beyond Net Zero Carbon” goal,² PSE seeks to collaborate with customers and industry partners to reduce carbon emissions through a variety of means, including the transition to electrified transportation. Currently, the transportation sector accounts for approximately 45% of Washington State’s annual carbon emissions.³ Accelerating widespread transportation electrification is vital to Washington State achieving its carbon reduction and clean air goals.

¹ Docket UE-210191 Acknowledgement Letter:

<https://apiproxy.utc.wa.gov/cases/GetDocument?docID=91&year=2021&docketNumber=210191>

² Puget Sound Energy, PSE sets "Beyond Net Zero Carbon" goal, “Company targets net zero carbon emissions, including natural gas sold to customers”, by 2045:

<https://www.pse.com/en/press-release/details/pse-sets-beyond-net-zero-carbon-goal>

³ Washington State Department of Ecology, “Zero emission vehicles”:

<https://ecology.wa.gov/Air-Climate/Climate-change/Reducing-greenhouse-gases/ZEV>

As PSE has learned from its Up & Go Electric Vehicle Pilots⁴, as well from the launch of its multifamily and fleet and commercial programs in the first quarter of 2023, customers expect the Company to provide a variety of TE products and services, such as building and fostering EV charging facilities and extending utility facilities that can support EV charging equipment. This includes embedding empower mobility programs to remove barriers for PSE's Equity-Focused Customers, defined as a customer that is part of Named Communities or a customer that shares demographic characteristics with customers in Named Communities and the Community-Based Organizations, government agencies, and tribal entities that serve them. These empower mobility programs ensure the aforementioned customers can access the specific benefits.

The proposed revisions and the new tariff schedule noted below are designed to further advance transportation electrification in Washington State. With the approval of these proposed TE products and services, PSE can help reduce carbon emissions, address market gaps, ensure equitable outcomes, and better serve all customer needs.

Summary of Proposed Tariff Schedule Changes

The following section provides a summary about the proposed tariff revisions and the new TE tariff schedule:

- **Schedule 583, Electric Vehicle Charging Products and Services**
This existing schedule sets the overall terms and conditions for transportation electrification products and services. The proposed Schedule 583 revisions will become applicable to all TE tariff schedules. The two Schedule 583 changes are: 1) adding definition of the term "Open Network" and 2) clarifying conditions regarding the customer information. These two changes are also incorporated into the proposed Schedules 551, 552, and 557 tariff sheets.
- **Schedule 551, Electric Vehicle Non-Residential Charging Products and Services**
The primary revisions to this schedule provide workplace and public Hosts with two ownership models to support the installation of open network EVSE at their site(s). The first option is a PSE-owned EVSE in which PSE will own and maintain the EVSE, including any necessary Company-side and Host-side facilities, based on a per charging port cost threshold. The second option provides the Host with per charging port incentives to help defray costs for Host installed, owned and maintained EVSE. The Host-owned incentive amounts differ based on whether the Host is an Equity-Focused Customer as defined in Schedule 583 and through PSE verification during the application process.
- **Schedule 552 Electric Vehicle Residential Charging Products and Services**
The proposed revisions to this schedule include a request to close out the pilot for PSE owned EV chargers to allow for customer owned charger incentives. Incentives will be provided for the procurement of qualifying networked level 2 chargers. Enhanced

⁴ PSE Up & Go Electric - Electric Vehicle Charging:

https://www.pse.com/pages/electric-cars?sc_camp=8B63EC9DCAEF46FE92D44E843ED7C1D9&gclid=EAJalQobChMI-qTtz5-2_gIVGSqtBh29mgbyEAAYASAAEgLR_D_BwE

incentives are available for Equity-Focused Customers after PSE verifies eligibility during the application process.

- **Schedule 557 Technology Demonstrations Products and Services**

The proposed new schedule is to make available limited-scale EV, EVSE, and other TE demonstration projects to identify, research, and test technologies or services that differ significantly from those already qualifying for funding under other existing PSE TE schedules. Key outcomes of such demonstrations can inform PSE of technical feasibility, operational requirements, system impacts, market/customer readiness, and/or community benefits.

These proposed EV tariff changes meet the intent of the Commission's policy and interpretive statement concerning Commission regulation of EV charging services related to the implementation of RCW 80.28.360, Electric Vehicle Supply Equipment ("Policy Statement") under Docket UE-160799⁵. At section 22 of page 12, the Commission's Policy Statement states that the "Legislature has provided the Commission with clear direction to encourage and direct regulated utilities to offer programs to promote EVSE on a regulated basis, in order to accelerate EV adoption to serve multiple public policy purposes, such as greenhouse gas and hazardous air pollutant reductions in the transportation sector."

Customers receiving EVSE products and services through PSE's TE schedules will automatically be enrolled in a new TE demand response schedule that will be submitted later after consultation with stakeholders. Residential and small non-residential customers will also be eligible for one of PSE's time varying rate schedules under Schedules 307, 317, 324, and 327 at the Company's discretion after those schedules are approved by the Commission. All these new schedules are designed to give customers better control over their electricity usage.

Interested Party Engagement

PSE would like to thank the interested parties who provided comments, questions, and their experience in the development of this tariff filing. There were two key groups with whom the Company engaged since the Commission acknowledged PSE's TEP in August 2021. Those groups were comprised of representatives from Highly Impacted Communities and Vulnerable Populations, and their service providers, as well as the Joint Utility Transportation Electrification Stakeholder Group⁶. Feedback from these engagements and PSE incorporation of such feedback helped inform this tariff filing as detailed in Attachments A and B to this filing.

- **Equity-Focused Customer Engagement**

⁵ Docket UE-160799 - Policy Statement EV Charging Services.pdf, Policy and Interpretive Statement Concerning Commission Regulation of Electric Vehicle Charging Services:

<https://apiproxy.utc.wa.gov/cases/GetDocument?docID=147&year=2016&docketNumber=160799>

⁶ *Id.*, page 40, section vii. Stakeholder Engagement, paragraph 91

In 2022, PSE embarked on a community engagement process designed to garner feedback from highly impacted communities, vulnerable populations, and their service providers on the design of its TEP phase II tariffed products and services, which are proposed in this tariff filing. PSE reached out to over 115 Community-Based Organizations (“CBO”), municipalities, government agencies, and tribal entities serving Named Communities and was able to connect with over 80 of those stakeholders. In addition, PSE connected with over 250 residents with an emphasis on customers in rural communities, those for whom English is not their first language, limited income households, and Black, Indigenous and People of Color (“BIPOC”) communities. Through interviews, focus groups, workshops, and surveys; PSE worked to understand the benefits and barriers that these entities and customers may face when it comes to transportation electrification and how future TE products and services can alleviate these barriers and maximize the desired benefits.

Participants were divided into single family residential, workplace, and public charging groups. Throughout the engagement process, these groups shared several common threads of feedback:

- Cost was consistently highlighted as a significant barrier throughout engagements. Specific instances included the cost of charging infrastructure and maintenance, the cost of electric vehicles, and the costs associated with a potential loss of parking space for non-EV drivers. When choosing scenarios, the majority of participants selected options with the lowest upfront costs.
- The logistics and project management surrounding EVSE installation and maintenance were also highlighted as significant barriers. A majority of participants selected scenarios where PSE would both help install and maintain the infrastructure long-term.
- The importance of education and outreach was a consistent connecting thread during conversations, but the comments were nuanced. Most participants noted that targeted and interactive engagement – such as test drives – is necessary to demystify EVs.
- Flexibility of TE products and services is essential. While similar themes emerged across many engagements, it also became clear how diverse each stakeholder’s needs and interests could be. Engagement participants made it clear that a one size fits all solution could not equitably serve community members in diverse geographies with different cultures, resources, access and abilities.

The categorization of TE products and services into single family residential, workplace, and public is relatively standard. PSE’s intent with its new and innovative (*i.e.*, N+I) engagement was to better understand what gaps the community sees in its existing products and services and determine if there is potential for PSE to address those gaps. As such, the N+I engagement followed a separate process with key findings listed below:

- **Partnership building:** Engagement participants consistently noted how critical it is for PSE to create and nurture mutually beneficial partnerships with Community-Based Organizations and other trusted messengers for the communities they are trying to reach. These partners can help amplify the available PSE TE products and services and support overall TE education and outreach.
- **Geographic disparities:** The difference in accessibility and resources between rural and urban communities was noted frequently in engagements. Participants specifically mentioned that transportation electrification in rural areas may require more time, money, and problem solving.
- **Lack of capacity:** Lacking of time, staff, and other resources continues to be a predominant barrier to transportation electrification for Named Communities and their service providers.
- **Flexibility of programs and services:** Each community will approach and respond to TE differently. Continued flexibility, humility, curiosity and community engagement on PSE's part will help develop nuanced and beneficial products and services for equally nuanced communities.

As a direct result of the needs and barriers expressed by the communities and the potential solutions they envisioned, PSE has implemented several design components in empower mobility programs to further support highly impacted communities, vulnerable populations; and the CBOs, government agencies and tribal entities that serve them. These design details include additional incentives, flexibility in TE tariff product and service requirements, and new technology demonstrations to engage these communities.

These design details are outlined in Attachment A to this filing, which includes components selected and designed to address barriers and needs identified through the Equity-Focused Customer engagement.

- **Joint Utility Transportation Electrification Stakeholder Group Engagement**

Since the Commission's approval of PSE's phase I TEP revisions to the existing electric service TE schedules and adding new electric service schedules under Docket UE-220294 on May 26, 2022, PSE's engagement with the Joint Utility Transportation Electrification Stakeholder Group has included:

- Presentation and discussion of the Up & Go Electric Pilot status, PSE's phase II TE tariff schedule filing strategy and regulatory timelines, PSE's community engagement plan, and the initial product and design concepts at a Joint Utility Transportation Electrification Stakeholder Group meeting on November 15, 2022;
- Presentation and discussion of updates to PSE's phase II tariff filing strategy and regulatory timelines, community engagement progress, and more detailed

- product and design concepts at a Joint Utility Transportation Electrification Stakeholder Group meeting on February 14, 2023;
- Distribution and preview of the draft tariff sheets pertaining to this filing to the Joint Utility Transportation Electrification Stakeholder Group via electronic mail on February 23, 2023, for a 45-day review and comment period concluding on April 6, 2022; and
 - Receipt by PSE of comments from the Joint Utility Transportation Electrification Stakeholder Group on the draft EV tariff schedules by April 6, 2023.
 - In addition, there were over 10 meetings and phone calls with interested parties to discuss questions and comments on the draft TE products and services.

PSE received written comments on the draft tariff sheets from three Joint Utility Transportation Electrification Stakeholder Group members. PSE has included as Attachment B to this filing a summary of these comments received from the three members of Joint Utility Transportation Electrification Stakeholder Group, responses from PSE for each item raised by each commenter, as well as an indication of whether the comment prompted revisions to the draft tariff sheets.

Cost Recovery

Under Docket UE-230040, approved by the Commission on February 23, 2023, PSE established electric Schedule 141TEP, Transportation Electrification Plan Adjustment Rider, which allows the Company to recover the costs of its TEP, which includes capital, depreciation, and O&M costs. Schedule 141TEP enables the recovery of these costs associated to the Commission-approved PSE TE products and services, through a separate tariff schedule, as authorized by Final Order 24/10 of Dockets UE-220066 and UG-220067, and UG-210918 (consolidated) (“Final Order 24/10”) issued on December 22, 2022. Upon Commission-approval, the costs for the implementation of these proposed changes and the new electric service schedule will also be recovered through Schedule 141TEP, and PSE will file updated Schedule 141TEP rates for investment in 2024 and beyond as appropriate.

Offsetting Benefits & Non-Rate-Based Funding

As conditioned in the Commission’s Final Order 24/10, the Commission stated that “we require that PSE demonstrate all offsetting benefits received or for which it has applied through the IRA and IJA for all retrospective review of provisional plant (capital projects). Further, we require PSE’s reporting to include all funding, tax benefits, or any other benefit for which it has and has not applied and, if it has not, the reasons justifying its decision to not pursue the IRA and IJA funding options”.⁷

⁷ Dockets UE-220066, UG-220067, and UG-210918 (Consolidated), Final Order 24/10, pg. 73

In the interest of adhering to this condition, PSE will assess potential offsetting benefits and non-rate-based funding that may be leveraged to further expand PSE's ability to accelerate the transition to electrified transportation. This may include tax credits made available through the Inflation Reduction Act ("IRA")⁸, grants awarded to the Company through the Infrastructure Investment and Jobs Act ("IIJA")⁹, or through the sale of carbon fuel credits under Washington State's Clean Fuel Standard¹⁰. PSE believes these funds will be additive to its existing TEP and will allow PSE to direct the incoming funds to fill newly identified gaps, or to amplify its TE tariffed products and services.

Reporting

PSE made the commitment to provide regular reporting in PSE's addendum to its 2021 Transportation Electrification Plan dated July 14, 2021, under the Docket UE-210191 ("Addendum"). In the Addendum, PSE outlines that PSE will release, through an informational filing with the Commission, periodic reports to PSE TEP stakeholders. These periodic reports will focus on major plan progress or changes, costs, expenses, and revenues.

Reports will include key metrics for the TE products and services, primarily focused on utilization information for installed EV chargers. Without placing a burden on the customer, and where available, PSE will collect information about additional customers served through any expansion of mobility services, additional EVs served in Named Communities, awareness and changes in adoption levels of EVs, and other non-quantifiable benefits enabled by PSE's TE incentives. PSE will also provide the total revenue of EVSE owned and operated by PSE, and detail all funding, tax benefits, or any other benefit for which it has and has not applied and, if it has not, the reasons justifying its decision to not pursue the funding options.

Conclusion

As detailed in PSE's TEP, PSE is committed to creating a better and cleaner energy future as the Company proactively works to do its part to support Washington State's clean energy goals. PSE believes that these proposed revisions to Schedules 551, 552, and 583 and the new Schedule 557 will mark another significant step toward meeting that objective and will help accelerate TE in Washington State, deliver benefits to all customers, and alleviate barriers and maximize desired benefits for Equity-Focused Customers. PSE is excited to deploy the TE products and services proposed in this filing and wants to thank the Commission, PSE customers, and valued TEP stakeholders for their support as PSE takes the next steps in executing on the strategies outlined in its TEP.

The tariff sheets described herein reflect an issue date of April 20, 2023, and an effective date of June 1, 2023. Posting of proposed tariff changes, as required by law and the Commission's rules

⁸ [Inflation Reduction Act of 2022 | Internal Revenue Service \(irs.gov\)](https://www.irs.gov)

⁹ [UPDATED FACT SHEET: Bipartisan Infrastructure Investment and Jobs Act | The White House](https://www.whitehouse.gov)

¹⁰ [Clean Fuel Standard - Washington State Department of Ecology](https://www.ecy.wa.gov)

Ms. Amanda Maxwell, Executive Director and Secretary

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and regulations, is being completed through web, telephone, and mail access in accordance with WAC 480-100-193. Notice to the public is published under the provisions of WAC 480-100-195(3), which allows a utility that proposes tariff changes, terms, or conditions without restricting access to the service to post the proposed changes in the manner it posts tariffs under WAC 480-100-193.

Please contact Mei Cass at (425) 462-3800 or mei.cass@pse.com; Paul Gardner at (425) 456-2787 or paul.gardner@pse.com for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

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Attachments: Electric Tariff Sheets (listed above)
Attachment A-Equity-Focused Design Components
Attachment B-Interested Party Comments