

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION)	
)	DOCKETS UE-200780 and
Complainant,)	UG-200781
)	
v.)	PETITION OF
)	PUGET SOUND ENERGY TO
PUGET SOUND ENERGY)	AMEND ORDER 01 TO REFLECT
)	EXTENSION OF CERTAIN
Respondent.)	PROVISIONS PURSUANT TO
)	ORDER 06 IN DOCKET U-200281

I. INTRODUCTION

1. In accordance with WAC 480-07-370(3), Puget Sound Energy (“PSE” or “Company”) respectfully petitions the Washington Utilities and Transportation Commission (Commission) for an Order amending the Commission’s Order 01 in the above-referenced dockets, to address the potential effects of the Commission’s extension of the April 1, 2022 date by which PSE was to resume the charging of late fees, reconnection fees and customer deposits. These charges are now suspended until such time that the Commission issues an order adopting rules or otherwise determining the propriety of the fee and deposit rules in Docket U-210800.¹

2. Statutes and rules at issue in this Amended Petition include RCW 80.01.040, RCW 80.28.020, WAC 480-07-370 (3), WAC 480-90-203 and WAC 480-07-370.

3. PSE is a combined gas and electric utility that provides service to approximately 1,200,000 electric customers and 860,000 natural gas customers in Western Washington.

4. All correspondence related to this Amended Petition should be directed as follows:

¹ In the Matter of Response to the COVID-19 Pandemic, Docket U-200281, Order 01 ¶23 (Oct. 20, 2020).

Puget Sound Energy
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II. BACKGROUND

5. On October 20, 2020, the Commission issued Order 01 in Docket U-200281, adopting with modifications a Revised Term Sheet presented by Commission Staff. Included in this Order were several guiding principles related to COVID-19 deferred accounting for “use in evaluating the deferred accounting petitions the utilities have filed or intend to file with respect to their recovery of costs related to responding to the COVID-19 pandemic.”

6. On September 3, 2020, PSE filed a Petition for an Order Approving Deferral of Costs Associated with the COVID-19 Public Health Emergency. The Company filed a revised petition on November 6, 2020 (Revised Petition), consistent with the requirements set out in the Revised Term Sheet. In its Revised Petition, PSE sought to defer, among other things, any amount of bad debt incurred in 2020-2022 above the bad debt baseline, defined as the amount currently being collected from customers for bad debt. For 2020, PSE proposed to use the pro-rated amount from its 2017 and 2019 general rate cases, and the 2019 rate case amounts for 2021 and 2022.

7. On March 29, 2022, the Commission issued Order 06 in Docket U-200281, amending its previous Order 03 in the docket and exempting electric and natural gas companies from collecting a deposit from residential customers in certain circumstances under WACs 480-100-113 and 480-90-113. These exemptions were set to continue until 30 days after the Commission issues its final order adopting rules or otherwise determines the propriety of the fee and deposit rules in Docket U-210800. The Commission’s amendments to Order 03 were to extend the suspension of

fees and deposits, and to extend reporting requirements until this same timeframe. Commission Staff's Fourth Revised Term Sheet, provided as Appendix A to Order 06, was reflective of these changes.

8. As a result of the extensions contained within the Commission's Order 06 in Docket U-200281, PSE requests to modify its approved timeframe for bad debt deferral (2020-2022) to extend to December 31, 2023, as bad debt will likely be affected for a longer duration as a result of the Commission's decision. PSE will update the level of bad debt being recovered in rates (which is the benchmark used for determining the amount to defer) once it receives new rates from its pending general rate cases under Docket Nos. UE-220066 and UG-220077.

III. REQUEST FOR RELIEF

9. For the reasons discussed above, PSE respectfully requests the Commission issue an Order amending the Commission's Order 01 in Dockets UE-200780 and UG-200781, to allow the Company to continue its deferral of bad debt expense accrued through December 31, 2023 pursuant to the extensions made by the Commission in Order 06 of Docket U-200281.

DATED this 8th day of December , 2022.

Puget Sound Energy

By */s/ Susan Free*

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