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March 17, 2014

Mr. Steven V. King Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, Washington 98504-7250

RE: Docket No. UE-131585 (Advice No. 2013-15) - <u>Do Not Redocket</u> Substitute Tariff Filing and Petition for an Accounting Order & Waiver of WAC 480-100-223 – Filed Electronically

Dear Mr. King:

Puget Sound Energy, Inc. ("PSE") hereby submits in connection with Docket No. UE-131585: 1) the following substitute tariff sheets to replace the sheets substituted on November 12, 2013, in this docket; and 2) a Petition for an Accounting Order & Waiver of WAC 480-100-223. This substitute filing is pursuant to RCW 80.28.060 and Chapter 480-80 WAC and includes the following portion of PSE's WN U-60, Tariff G for electric service.

Original Sheet No. 195 - Schedule 195: Electric Vehicle Charger Incentive Original Sheet No. 195-A - Schedule 195: Electric Vehicle Charger Incentive (Continued)

One purpose of this filing is to implement tariff schedule language changes made in consultation with WUTC Staff to clarify some aspects of this incentive. The changes clarify the availability of the eligible customers based on the vintage of their electric vehicle. The changes clarify that the cost recovery of costs related to the data collection and study of the overall program will be recovered through the specified mechanism. WUTC Staff and PSE had several discussions of enhancing the collection of data regarding this incentive program. Some of the topics that WUTC Staff and PSE have identified as goals of data collection and data collection design include: 1) determine total load and growth rate; 2) compare load shape of electric vehicle charging to PSE's load; 3) determine cost of EV charging under current conditions; 4) develop load curves for uncontrolled charging by different data methods; 5) experience different smart charger types; and 6) determine which data collection is most cost-effective. The addition of these goals of data collection and data collection and data collection design as part of the study will not alter the \$600 incentive amount.

The second purpose of this filing is to request a petition for an accounting order authorizing accounting treatment related to funding and cost recovery of incentive and a waiver of WAC 480-100-223. These two components of the petition were requested by WUTC Staff in discussions with PSE, and PSE is including this request as part of this filing.

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This substitution is provided for in WAC 480-80-111(a) as it does not make any material change to the pending tariff sheets and the changes are made to address commission concerns with the filing.

Please contact Lynn Logen at (425) 462-3872 or at lynn.logen@pse.com for additional information about this filing. If you have any other questions please contact me at (425) 456-2110.

Sincerely. en, Tariff Consultant

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Enclosures

cc: Sheree Carson, Perkins Coie Simon ffitch, Public Counsel