



Puget Sound Energy
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PSE.com

July 19, 2019

Filed Via Web Portal

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**Re: Docket UE-190575 (Advice No. 2019-29)
PSE's Electric Tariff Filing – Do Not Redocket**

Dear Mr. Johnson:

Puget Sound Energy (“PSE”) submits in connection with Docket UE-190575 the following tariff sheets to replace the tariff sheets that accompanied PSE’s June 28, 2019 filing which was submitted under PSE’s Advice No. 2019-29. In addition, PSE newly submits into this docket, at the request of Commission Staff, revisions to Attachments B and Attachment C to electric Schedule 152. This filing includes the following portion of the Company’s WN U-60 tariff for electric service.

- 8th Revision of Sheet No. 150, Schedule 150, Net Metering Services for Customer-Generator Systems
- 7th Revision of Sheet No. 150-A, Schedule 150, Net Metering Services for Customer-Generator Systems
- 11th Revision of Sheet No. 150-B, Schedule 150, Net Metering Services for Customer-Generator Systems
- 9th Revision of Sheet No. 150-C, Schedule 150, Net Metering Services for Customer-Generator Systems
- 5th Revision of Sheet No. 150-D, Schedule 150, Net Metering Services for Customer-Generator Systems
- 3rd Revision of Sheet No. 150-E, Schedule 150, Net Metering Services for Customer-Generator Systems
- 2nd Revision of Sheet No. 150-H, Schedule 150, Net Metering Services for Customer-Generator Systems
- 2nd Revision of Sheet No. 150-I, Schedule 150, Net Metering Services for Customer-Generator Systems
- 1st Revision of Sheet No. 150-K, Schedule 150, Net Metering Services for Customer-Generator Systems
- 1st Revision of Sheet No. 152-A, Schedule 152, Interconnection with Electric Generators (Continued)
- 1st Revision of Sheet No. 152-B, Schedule 152, Interconnection with Electric Generators (Continued)
- 1st Revision of Sheet No. 152-S, Schedule 152, Interconnection with Electric Generators (Continued)
- Attachment “A-1” Procedures, Terms & Conditions – Tier 1 Generating Facilities - to Schedule 152
- Attachment “A-2” Procedures, Terms & Conditions – Tier 2 Generating Facilities - to Schedule 152

Attachment “B” Application Tier 1 - to Schedule 152
Attachment “C” Application Tier 2 and Tier 3- to Schedule 152

The purpose of this substitute filing made at the request of Commission Staff is threefold, 1) to make typographical corrections, including a corrected original cover letter dated June 28, 2019 with the additions of Attachments A-1, A-2 and A-3 to Schedule 152 (inadvertently omitted in the original filing), and Attachment B and Attachment C to Schedule 152 (newly included in this

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docket at the request of Commission Staff), 2) to provide additional explanation regarding the fees proposed in this filing, including a revised work paper, and 3) to clarify the application process.

The original filing proposed a \$145.00 Application Fee for Net Metering Systems up to 100 kW that use UL Listed inverter-based technology, a \$150.00 one-time Aggregation Set-Up Charge, and an Excess Site Visit Fee of \$240. PSE agrees with Commission Staff's suggestion that the annual account maintenance component of the one-time Aggregation Set-Up Charge should not be included. A revised work paper that reflects the same is included with this substitute filing. PSE therefore proposes a \$100 one-time Aggregation Set-Up Charge. The revised work paper also includes the addition of a tab titled "Matrix of Current and Proposed" which outlines current and proposed Application Fees and Aggregation Set-Up Charges.

PSE believes these charges are consistent with RCW 80.60.020(1), which in part states, "... (i) The electric utility will incur direct costs associated with interconnecting or administering net metering systems that exceed any offsetting benefits associated with these systems; and (ii) Public policy is best served by imposing these costs on the customer-generator rather than allocating these costs among the utility's entire customer base...". Direct administration costs, primarily those for labor, are included in the filed work paper supporting both the Application Fee and the Aggregation Set-Up Charge. Direct travel costs, primarily those for labor, are included in the filed work paper supporting the Excess Site Visit Fee.

PSE strives for balance between serving public policy (encouraging net metering), and collecting the specific costs of serving the optional Customer-Generator. The Company has provided the estimated administrative costs associated with the net metering program, specifically those costs related to processing new applications to interconnect net metering systems. Costs will increase as net metered system capacity grows closer to four percent of 1996 peak load. In comparison, the proposed application fee contained in this filing will collect a relatively small portion of these increased costs. In addition, other activities associated with the interconnection of net metering systems are provided at no cost to optional Customer-Generators, such as the installation of upgraded meters, and the transportation, labor and equipment required for system testing. We also exclude the costs to the Company of the net metered energy itself. Customer-Generators are credited at the full retail rate while the value to the Company of that energy has not yet been determined, but is likely lower than the retail rate.

This filing incorporates instructions for completing an online application for new net metering systems. For any customer unable to utilize the online application format, PSE is available by phone to assist with the completion of their application; the phone number is 800-562-1482.

Consistent with electric Schedule 171 Non-Communicating Meter Service, Section 6(3)(c), customers taking service under Schedule 150 are excluded from the non-communicating meter service, and vice versa. This specification is due to the necessity of automated meter reads for the purposes of metering, measurement, and billing for the administration of Schedule 150.

Mr. Mark L. Johnson
July 18, 2019
Advice No. 2019-29
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The tariff sheets and attachments described herein reflect the original issue date of June 28, 2019, and effective date of July 28, 2019. Posting of proposed tariff changes, as required by law and the Commission's rules and regulations, is being made by posting the proposed tariff sheets and attachments on the PSE web site in accordance with WAC 480-100-193. This tariff change does not increase recurring charges nor restrict access to this optional service.

Please contact Julie Waltari at (425) 456-2945 or Veronica Martin at (425) 457-5624 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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Director, Regulatory Affairs
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cc: Lisa Gafken, Public Counsel
Sheree Carson, Perkins Coie

Attachments:

Electric Tariff Sheets & Attachments (listed above)
Revised Work Paper – Matrix & Calculation of Charges and Fees
Substitute Cover Letter (6-28-19)