

Puget Sound Energy P.O. Box 97034 Bellevue, WA 98009-9734 PSE com

February 17, 2016

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

RE: Docket Nos. UE-151871 and UG-151872 (Consolidated) Advice No. 2015-24 <u>**Do Not Redocket -**</u> Substitute Tariff Filing – Filed Electronically

Dear Mr. King:

Puget Sound Energy ("PSE") hereby submits in connection with Docket Nos. UE-151871 and UG-151871 (Consolidated), the following tariff sheets and attachment to replace the tariff sheets and attachment accompanying PSE's September 18, 2015, filing, which was submitted under PSE's Advice No. 2015-24 and substituted on November 6, 2015. This substitute filing is pursuant to the Prehearing Conference Order, Order 02 in Docket UG-151872, and the Procedural Schedule set forth in Appendix B to that order, which requires PSE to file a revised tariff by February 17, 2016. This substitute tariff filing is also filed pursuant to RCW 80.28.060 and Chapter 480-80 WAC, and includes the following portion of the Company's WN U-2 Tariff for natural gas service:

WN U-2, Natural Gas Service:

Original Sheet No. 175 - Schedule No. 75: Equipment Lease Service Original Sheet No. 175-A - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-B - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-D - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-H - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-I - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-K - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-L - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-M - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-N - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-O – Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-P - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-Q - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-R - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-T - Schedule No. 75: Equipment Lease Service (Continued) Original Sheet No. 175-U - Schedule No. 75: Equipment Lease Service (Continued) Attachment "A" to Natural Gas Schedule No. 75: Equipment Lease Service

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The purpose of this substitute tariff filing is to 1) add monthly lease rates to the tariffs, which are consistent with the Rate Methodology general description provided as Attachment B to PSE's Advice Letter filed on September 18, 2015, 2) remove Attachment B; and 3) update various other terms throughout the tariff to address concerns raised by stakeholders. Briefly, the filed revisions:

- clarify the PSE internal creditworthiness score customers must demonstrate to qualify for the lease service (Schedule 75-0);
- update equipment to be leased and monthly lease charges (Schedule 75-A and Schedule 75-B);
- revise language regarding residential customer's representations and warranties (Schedule 75-H and Schedule 75-I);
- revise language regarding commercial customer's representations and warranties (Schedule 75-K);
- clarify customer responsibility for installation costs relating to non-standard conditions (Schedule 75-L);
- remove language regarding access to equipment for maintenance (Schedule 75-M);
- revise language regarding maintenance schedule (Schedule 75-N);
- provide more detailed language regarding maintenance and repair responsibilities (Schedule 75-O);
- revise options regarding equipment failure during lease term (Schedule 75-P);
- remove options regarding equipment failure outside of warranty period (Schedule 75-Q);
- revise language regarding option to purchase (Schedule 75-R);
- revise conditions constituting default and require 30-days written notice before terminating lease (Schedule 75-T);
- revise options available to customer at end of lease term and require 30-days written notice before terminating lease (Schedule 75-U);
- remove references to Attachment B and the "Model"/"Leasing Monthly Price Model" (Schedule 75, 75-D) – now that PSE has added the monthly rates to the tariff schedules, the attachment and the references to it are no longer needed - they were only needed due to the "2-Phase" structure of PSE's original filing

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Please contact Malcolm McCulloch at (425) 424-6530 or Eric Englert (425) 456-2312 for additional information about this filing. If you have any other questions please contact me at (425) 456-2110.

Sincerely, Erul.

Ken Johnson Director, State Regulatory Affairs

Enclosures

cc: Sheree Carson, Perkins Coie Christopher M. Casey, Assistant Attorney General, UTC Staff Sally Brown, Senior Assistant Attorney General, UTC Staff Simon ffitch, Senior Assistant Attorney General, Public Counsel Jeffrey D. Goltz, Cascadia Law Group James L. King, WSHVACCA