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Received
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Apr 11, 2024

April 11, 2024

Filed Via Web Portal

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**Re: Docket UE-240138 (Advice No. 2024-06)
Puget Sound Energy's Electric Tariff Filing – Do Not Redocket**

Dear Executive Director Killip:

Puget Sound Energy (“PSE”) hereby submits in connection with Docket UE-240138 the following revised electric tariff sheets as a substitution for the tariff sheets that accompanied its March 1, 2024 filing, submitted under Advice No. 2024-06.

WN U-60, Tariff G - (Electric Tariff):

- 32nd Revision of Sheet No. 120 - Electricity Conservation Service Rider
- 33rd Revision of Sheet No. 120-A - Electricity Conservation Service Rider (Continued)
- 36th Revision of Sheet No. 120-B - Electricity Conservation Service Rider (Continued)
- 30th Revision of Sheet No. 120-E - Electricity Conservation Service Rider (Continued)
- 11th Revision of Sheet No. 120-G - Electricity Conservation Service Rider (Continued)

The purpose of this substitute tariff filing is to revise the electric revenue requirement and calculation of rates to correct the allocation of electric costs that were misallocated to natural gas. A thorough portfolio review identified three programs that slightly over-charged natural gas work orders in 2022 by \$23,894.35 and in 2023 by \$86,945.60. Specifically, Multi-Family New Construction, Commercial New Construction and Small Business Direct Install programs.

The Multi-Family and Commercial New Construction programs issue stems from applying standard cost splits across electric and natural gas for all vendor costs, instead of a subset of those costs where such a split is appropriate. The Small Business Direct Install program correction stems from one invoice that applied costs to natural gas when instead all costs should have been applied to electric.

This filing proposes to increase the electric revenue requirement by \$116,631, the amount of the combined 2022 and 2023 corrections grossed up for revenue sensitive items. A similar revenue

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requirement decrease was proposed today for the natural gas filing in a separate Natural Gas Schedule 120 substitute tariff filing under Docket UG-240139.

The revised electric revenue requirement in this filing is \$118.8 million, a 0.1 percent increase to the revenue requirement proposed in PSE's original filing. This is \$23.9 million higher than the \$94.9 million requested in last year's filing under Docket UE-230139. This is due to a \$3.3 million decrease in the budget for the 2024 program year, and an increase of \$27.2 million in the true-up for spending, load variances and revenue sensitive fees and taxes, as compared to 2023.

Overall, this proposal results in a 0.73 percent increase in customer bills. Although this is a slight increase compared to the original filing, the overall average percent increase remains the same. A typical residential customer on Schedule 7 using 800 kWh per month would experience an increase of \$0.84 per month or 0.77 percent, which is consistent with PSE's initial filing.

This substitution is provided for in WAC 480-80-111(1) Substitute Tariff Filings, as the proposed changes address concerns of the Commission regarding the pending tariff sheets. However, PSE respectfully requests that the Commission grant a waiver of the provisions in (1)(b), Rule 111, Chapter WAC 480-80. PSE's April 11, 2024 substitute tariff filing incorporates reallocated costs into its calculation of rates; this results in a slight, but negligible, increase to the rates it originally filed on March 1, 2024.

The tariff sheets described herein reflect the original issue date of March 1, 2024, and the original effective date of May 1, 2024. Posting of proposed tariff changes, as required by WAC 480-100-193, is being accomplished by posting the proposed tariff sheet on the PSE web site coincident with the date of this transmittal letter.

Please contact Julie Waltari at julie.waltari@pse.com or (425) 456-2945 for additional information about this filing. If you have any other questions, please contact me at Birud.Jhaveri@pse.com.

Sincerely,

/s/ Birud D. Jhaveri

Birud D. Jhaveri
Director, Regulatory Affairs
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cc: Tad O'Neill, Public Counsel
Sheree Carson, Perkins Coie

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Attachments:

Substitute Electric Tariff Sheets (listed above)

Revised Revenue Requirement Work Paper

Revised Cost of Service Work Paper