



Puget Sound Energy  
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PSE.com

September 17, 2020

***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

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COMMISSION

**Re: Docket UE-200770 (Advice No. 2020-25)  
PSE Electric Tariff Filing – Do Not Redocket**

Dear Mr. Johnson:

Puget Sound Energy (“PSE”) submits in connection with Docket UE-200770 the following tariff sheets along with the electric rate design work paper to replace those which accompanied PSE’s August 31, 2020 filing submitted under PSE’s Advice No. 2020-25. This substitute filing includes the following portion of the Company’s WN U-60 Tariff G for electric service.

17 <sup>th</sup> Revision of Sheet No. 129	Low Income Program
4 <sup>th</sup> Revision of Sheet No. 129-A.1	Low Income Program (Continued)
16 <sup>th</sup> Revision of Sheet No. 129-B	Low Income Program (Continued)
16 <sup>th</sup> Revision of Sheet No. 129-C	Low Income Program (Continued)
16 <sup>th</sup> Revision of Sheet No. 129-E	Low Income Program (Continued)
15 <sup>th</sup> Revision of Sheet No. 129-F	Low Income Program (Continued)
16 <sup>th</sup> Revision of Sheet No. 129-G	Low Income Program (Continued)
7 <sup>th</sup> Revision of Sheet No. 129-H	Low Income Program (Continued)
5 <sup>th</sup> Revision of Sheet No. 129-I	Low Income Program (Continued)

On August 31, 2020, PSE proposed an increase in the total electric low income program electric revenue requirement of \$4,673,709. The change in revenue requirement resulted in an average overall increase to rates for electric customers of 0.23 percent. In that filing, PSE included excess Crisis Affected Customer Assistance Program (“CACAP”) funding which resulted in the revenue requirement being \$4.5 million higher than it otherwise would be<sup>1</sup>. In its original filing, PSE also provided an alternative filing that provided an option to remove the \$4.5 million from the rate

<sup>1</sup> Under Docket No. UE-200672, PSE increased the electric cap associated with its Crisis Affected Customer Assistance Program to \$12.3 million. The original electric cap of \$7.8 million was chosen as it was set at the level of funding available from previously undistributed electric HELP funds that existed as of September 30, 2019. The funding source specified in the cover letter in Docket No. UE-200672 for amounts distributed above the original \$7.8 million electric cap was to be collected from electric customers during the rate period set in this filing. This collection was to be in addition to the funds collected for HELP.

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which, if chosen, would result in a very minimal increase to electric customer rates. As CACAP applications will continue to be accepted through September 30, 2020, PSE does not know the actual amount, if any, that CACAP electric distributions will exceed the original \$7.8 million cap. Under the alternative filing, the proposal was to fund any excess electric distributions from previously collected gas CACAP funds that have not been distributed.

Although excess distributions are not known with certainty at this time, the additional time that has passed since PSE's filing has allowed PSE to determine a better estimate of the excess distributions than it had available at the time of its original filing on August 31, 2020. With its updated estimate, PSE believes electric CACAP excess distributions will likely be up to only \$1 million above the original \$7.8 million CACAP cap. Therefore, at Staff's recommendation, PSE is substituting the tariff sheets in this filing with the alternative provided in its original filing which removes the \$4.5 million of excess distributions from the revenue requirement. As the actual excess distributions are not expected to be as material as originally expected, PSE proposes that, rather than funding excess distributions with gas funds, the actual excess amounts, if any, be trued-up in electric rates in next year's low income filing.

The additional purpose of this substitute filing is to withdraw a tariff sheet included in the original tariff filing and cover letter as there are no longer proposed changes to that sheet. Please remove the 18<sup>th</sup> Revision of Sheet No. 129-D.

The tariff sheets described herein reflect an issue date of August 31, 2020, and effective date of October 1, 2020. Posting of proposed tariff changes, as required by law and the Commission's rules and regulations, is being completed through web, telephone and mail access in accordance with WAC 480-100-193.

Please contact Veronica Martin at (425) 457-5624 or [veronica.martin@pse.com](mailto:veronica.martin@pse.com) for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

*/s/ Jon A. Piliaris*

Jon A. Piliaris - Director, Regulatory Affairs

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cc: Lisa Gafken, Public Counsel  
Sheree Carson, Perkins Coie

Attachments:

Electric Tariff Sheets (listed above)

Work Papers