



# PUGET SOUND ENERGY

*The Energy To Do Great Things*

Puget Sound Energy, Inc.

P.O. Box 97034

Bellevue, WA 98009-9734

May 22, 2009

Mr. David Danner, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

**Re: Advice No. 2009-14  
Electric Tariff Filing - Filed Electronically**

Dear Mr. Danner:

Puget Sound Energy, Inc. (the "Company" or "PSE") hereby submits proposed revisions to its electric Schedule 120, Electricity Conservation Service Rider and electric Schedule 121, Electricity Conservation Incentive Mechanism. This filing, pursuant to RCW 80.28.060 and Chapter 480-80 WAC, proposes revisions in the following electric tariff sheets.

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

- Eighteenth Revision of Sheet No. 51 - LED (Light Emitting Diode) Lighting Service – Company Owned
- Fourth Revision of Sheet No. 51-a - LED (Light Emitting Diode) Lighting Service – Company Owned  
(Continued)
- Original Sheet No. 51-b - LED (Light Emitting Diode) Lighting Service – Company Owned (Continued)
- Original Sheet No. 51-c - LED (Light Emitting Diode) Lighting Service – Company Owned (Continued)
- Original Sheet No. 51-d - LED (Light Emitting Diode) Lighting Service – Company Owned (Continued)
- Original Sheet No. 51-e - LED (Light Emitting Diode) Lighting Service – Company Owned (Continued)
- Original Sheet No. 51-f - LED (Light Emitting Diode) Lighting Service – Company Owned (Continued)
- Twentieth Revision of Sheet No. 53 - Street Lighting Service
- Third Revision of Sheet No. 53-d - Street Lighting Service (Continued)
- Third Revision of Sheet No. 53-e - Street Lighting Service (Continued)
- Third Revision of Sheet No. 53-f - Street Lighting Service (Continued)
- Original Sheet No. 53-g - Street Lighting Service (Continued)

The primary purpose of this filing is to offer LED (light emitting diode) outdoor lighting services. Schedule 51 provides for Company-Owned LED lighting while Schedule 53 has been modified to offer Customer-Owned LED lighting. More specifically, Schedule 51 is a new schedule, while Schedule 53 is an existing schedule that has been modified.

The Company has received several requests for LED lighting and is therefore making these changes to its tariff. By offering LED lighting the Company will be able to gain more experience with LEDs. Currently the Company has found that for many of the available LED street lights the lumens of light output per watt of electricity input are lower than sodium vapor street lights and LED street lights are much more expensive to purchase. Technology is rapidly changing and these facts may be reversed in the near future.

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In addition to providing for LED lighting other minor changes have been made to Schedule 53. Those changes include capitalizing defined terms, clarifying the wording in section 5 of the Availability section, section 1 of the Limited Service section (both on Sheet 53), and section 5 of the Type Of Service section (on Sheet 53-a). On Sheet 53-e, a sentence that was no longer operable because we are past the effective time period was deleted. The provisions on Sheet 53-g (the rates for Customer-Owned LED lights) would have been inserted on Sheet No. 53-c, but that sheet is currently included in the Company's general rate case. The rates will be moved to Sheet 53-c following the conclusion of the general rate case.


As these lights represent a new technology, the Company has limited knowledge of the operating and maintenance costs of the lights. Therefore, costs for existing sodium vapor lights have been used to develop the initial rates. Costs related to these lights may change significantly or the costs may be much different than the Company has estimated resulting in the Company finding it necessary to request changes in these rates in the future.

The tariff sheets described herein reflect issue dates of May 22, 2009, and effective dates of June 22, 2009. Posting of proposed tariff changes, as required by WAC 480-100-193, is being made by posting the proposed tariff sheets on the PSE web site immediately prior to or coincident with the date of this transmittal letter.

This tariff change does not increase recurring charges or restrict access to services. Therefore, notice of proposed tariff change, as required by law and the Commission's rules and regulations (including WAC 480-90-195(3)), is being given to the public immediately prior to, or coincident with, the date of this transmittal letter through web, telephone and mail access in accordance with WAC 480-100-193.

Please contact Lynn Logen at (425) 462-3872 for additional information about this filing. If you have any other questions please contact me at (425) 462-3495.

Very truly yours,



Tom DeBoer  
Director, Federal & State Regulatory Affairs

Enclosures

cc: Simon J. ffitich, Public Counsel  
Sheree Carson, Perkins Coie