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

November 23, 2009

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

RE:

Advice No. 2009-30

Natural Gas Tariff Filing - Filed Electronically

Dear Mr. Danner:

Pursuant to RCW 80.28.060 and Chapter 480-80 WAC, please find enclosed for filing the following proposed revisions to the WN U-2 tariff for natural gas service of Puget Sound Energy (the "Company" or "PSE").

First Revision of Sheet No. 1132

- Schedule 132 - Merger Rate Credit

First Revision of Sheet No. 1132-A

- Schedule 132 - Merger Rate Credit (Continued)

The purpose of this filing and the electric tariff filing being submitted coincident with this filing is to implement the annual update to the Merger Rate Credit required as part of the Multiparty Settlement Stipulation in Docket No. U-072375. The Multiparty Settlement Stipulation is Attachment A to Order No. 8 in Docket No. U-072375 (the "Order"). The Merger Rate Credit (Transaction Commitment number 34) is a commitment to provide rate credits of \$100 million over a 10-year period (\$10 million per year for ten years).

As provided in the Order, the rate credits of \$10 million per year are comprised of \$8.8 million that is not offsettable and \$1.2 million that is fully offsettable to the extent that the Company can demonstrate in a rate proceeding that the savings associated with the merger are reflected in the underlying cost of service. This filing reflects a total of \$928,354 in offsets to the \$1.2 million. Offsets totaling \$113,416 were reflected in the cost of service in Docket Nos. UE-072300 and UG-072301 and offsets totaling \$1,352,839 were reflected in the cost of service in Docket Nos. UE-090704 and UG-090705, however the amount offsettable is limited to \$1.2 million. The year that the rates proposed in this filing will be effective is comprised of approximately three months when the rates from Docket Nos. UE-072300 and UG-072301 will be effective and nine months when rates from Docket Nos. UE-090704 and UG-090705 will be effective. Therefore, to determine the total amount of offset for the rate year, the \$113,416 associated with Docket Nos. UE-072300 and UG-072301 was multiplied by 3 (months) and divided by 12 (months). Likewise, the \$1.2 million associated with Docket Nos. UE-090704 and UG-090705 was multiplied by 9 (months) and divided by 12 (months) resulting in a total offset to the \$1.2 million of \$928,354.

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This rate credit is applied to natural gas customer bills on a per-therm or per rental unit basis. During the period between February 13, 2009, and December 31, 2009, (November and December are projected amounts) the Company expects to apply a total of \$9,457,836 to customer bills (both electric and natural gas) which will be \$428,748 less than was projected for that time period. This difference is due to the actual loads varying from projected loads. The \$428,748 has been added to the total revenue requirement for the 2010 rate year.

The conversion factor is applied to the total revenue requirement which is allocated between natural gas and electric customers on the basis of the four-factor allocation. This results in a total natural gas revenue requirement of \$3,582,894. Taking into account changes from last year (including changes in the offsettable amount, changes in load and a true-up of last year) the rates in this filing represent an impact on customers that is a 0.1% overall increase in rates. Work papers supporting the total amount to be passed through for the year ending December 31, 2010, and the spread of this amount to rates are also enclosed.

As stated in the Company's February 4, 2009 filing of this Schedule and as reflected in Section 8 of the schedule (see Sheet 1132-A), the rates filed each year in Schedule 132 are credits and the Company will publish this tariff change in the manner it posts tariffs under WAC 480-90-193, even though this filing results in an overall increase in rates. The filing will be published by posting the change on its web site immediately prior to, or coincident with the date of this transmittal letter and making information available by telephone and mail, all in accordance with WAC 480-90-193(1).

The tariff sheets described herein reflect an issue date of November 23, 2009, and an effective date of January 1, 2010. Posting of proposed tariff change, as required by WAC 480-90-193, is being made by posting the proposed tariff sheet on the PSE web site immediately prior to, or coincident with, the date of this transmittal letter in accordance with WAC 480-90-193(1).

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,

Tam DiBur

Tom DeBoer

Director, Federal & State Regulatory Affairs

Enclosures

cc:

Simon J. ffitch, Public Counsel Paula Pyron, NWIGU Sheree Carson, Perkins Coie