



Puget Sound Energy
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January 25, 2019

Filed Via Web Portal

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

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UTIL. AND TRANSP.
COMMISSION

**RE: Advice No. 2019-02
Natural Gas Tariff Filing – Filed Electronically**

Dear Mr. Johnson:

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 (“PSE”).

WN U-2 Tariff

- 2nd Revision of Sheet No. 37-C - Rule No. 23, Interruptible Sales and Transportation Service (Continued)
- Original Sheet No. 37-C.1- Rule No. 23, Interruptible Sales and Transportation Service (Continued)
- 3rd Revision of Sheet No. 37-D - Rule No. 23, Interruptible Sales and Transportation Service (Continued)
- 1st Revision of Sheet No. 43-B - Rule No. 29: Terms of Distribution System Transportation Service (Continued)
- Original Sheet No. 43-B.1 - Rule No.29: Terms of Distribution System Transportation Service (Continued)
- 1st Revision of Sheet No. 43-H - Rule No. 29: Terms of Distribution System Transportation Service (Continued)
- 1st Revision of Sheet No. 43-I - Rule No. 29: Terms of Distribution System Transportation Service (Continued)
- Original Sheet No. 43-J - Rule No. 29: Terms of Distribution System Transportation Service (Continued)

The purpose of this filing is to propose clarifying revisions to the tariff language regarding Gas Service Curtailment and Overrun and Underrun Entitlement (“Entitlement”) in Rule Nos. 23 and 29 and to propose new Entitlement penalty charges in Rule No. 23. This filing proposes a new provision on how PSE may notify Customers during a Constraint Period and other distinguishing provisions that are applicable during a PSE declared Curtailment or Entitlement Constraint Period.

PSE may declare a Curtailment or Entitlement Constraint Period because of the conditions imposed by PSE’s upstream pipeline service provider, Northwest Pipeline Corp., (“NWP”) or due to operational difficulties on the PSE’s distribution system. A Constraint Period may be

applicable to certain individual customers or a group of customers under certain rate schedule(s) or area(s) depending on the status of the natural gas supply and pipeline systems, and PSE's distribution systems.

Curtailement

All natural gas Customers are subject to Gas Service Curtailement as provided under PSE's Rule No. 21, Firm Service Priority, and Rule No. 23, Interruptible Sales and Transportation Service. No Curtailement in firm Gas Service will be imposed by PSE until all interruptible service Customers in the area affected have been ordered to curtail to one hundred percent of their interruptible requirement (Rule No. 21, Section 1). The proposed revisions in this filing do not change any terms and conditions of Curtailement in Rule Nos. 21 and 23 but create new paragraphs in Rule No. 23 for Entitlement to provide detailed Entitlement terms and different penalty charge amounts for Curtailement and Entitlement.

Entitlement

Entitlement pertains exclusively to Customers receiving Gas Service under PSE's distribution system transportation service tariff schedules and rules. Entitlement is related to the percentage of tolerance that a transportation Customer is allowed to deviate from their Confirmed Nomination. Overrun Entitlement is a period of time in which delivered gas volumes to a transportation Customer on PSE's distribution system may not exceed the Customer's Confirmed Nomination for that day (Rule No. 2, section 24). Underrun Entitlement is a period of time in which delivered gas volumes to a transportation Customer on PSE's distribution system is required to be equal to or more than the Customer's Confirmed Nomination for that day (Rule No. 2, section 35). Unauthorized gas volumes delivered/not delivered outside of PSE's declared entitlement tolerance are subject to penalties that reflect the conditions of an Overrun Entitlement or Underrun Entitlement. In this filing, PSE proposes to revise those penalty charges and the penalty structure. PSE worked closely with the Alliance of Western Energy Consumers on these proposed changes.

The proposed Entitlement penalty structure and reduced penalty charges are designed to better align with those charged by NWP and other natural gas local distribution companies in Washington State. In addition to outlining the structure of the penalty charges and rates, PSE also clarifies how certain charges are calculated in the proposed tariff sheets.

The tariff sheets described herein reflect an issue date of January 25, 2019, and an effective date of March 1, 2019. These tariff changes do not increase recurring charges or restrict access to services. 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 480-90-193(1). Posting of the proposed tariff change, as required by WAC 480-90-193, 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.

Mr. Mark L. Johnson
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Please contact Eric Englert at (425) 456-2312 or Mei Cass at (425) 462-3800 for additional information about this filing. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

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

Attachments: Natural Gas Tariff Sheets (listed above)