



Puget Sound Energy
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October 1, 2021

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Ms. Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**Re: Advice No. 2021-32
PSE's Electric Tariff Filing - Filed Electronically**

Dear Ms. Maxwell:

Pursuant to RCW 80.28.060 and WAC 480-80-101 and -105 please find enclosed for filing the following proposed revisions to the WN U-60, tariff for electric service of Puget Sound Energy ("PSE"):

WN U-60, Tariff G, Electric Service:

21 st Revision	Sheet No. 51	LED (Light Emitting Diode) Lighting Service
8 th Revision	Sheet No. 51-A	LED (Light Emitting Diode) Lighting Service (Continued)
7 th Revision	Sheet No. 51-B	LED (Light Emitting Diode) Lighting Service (Continued)
7 th Revision	Sheet No. 51-C	LED (Light Emitting Diode) Lighting Service (Continued)
8 th Revision	Sheet No. 51-D	LED (Light Emitting Diode) Lighting Service (Continued)
3 rd Revision	Sheet No. 51-E	LED (Light Emitting Diode) Lighting Service (Continued)
3 rd Revision	Sheet No. 51-F	LED (Light Emitting Diode) Lighting Service (Continued)
2 nd Revision	Sheet No. 51-G	LED (Light Emitting Diode) Lighting Service (Continued)
2 nd Revision	Sheet No. 51-H	LED (Light Emitting Diode) Lighting Service (Continued)
Original	Sheet No. 51-I	LED (Light Emitting Diode) Lighting Service (Continued)
23 rd Revision	Sheet No. 53	Street Lighting Service
25 th Revision	Sheet No. 53-A	Street Lighting Service (Continued)
22 nd Revision	Sheet No. 53-B	Street Lighting Service (Continued)
16 th Revision	Sheet No. 53-C	Street Lighting Service (Continued)
6 th Revision	Sheet No. 53-D	Street Lighting Service (Continued)
5 th Revision	Sheet No. 53-E	Street Lighting Service (Continued)
10 th Revision	Sheet No. 53-F	Street Lighting Service (Continued)
7 th Revision	Sheet No. 53-G	Street Lighting Service (Continued)

2 nd Revision	Sheet No. 53-K	Street Lighting Service (Continued)
2 nd Revision	Sheet No. 53-L	Street Lighting Service (Continued)
1 st Revision	Sheet No. 53-M	Street Lighting Service (Continued)
5 th Revision	Sheet No. 80-X	General Rules and Provisions (Continued)
Original	Sheet No. 80-X.1	General Rules and Provisions (Continued)
Original	Sheet No. 80-X.2	General Rules and Provisions (Continued)
Original	Sheet No. 80-X.3	General Rules and Provisions (Continued)
9 th Revision	Sheet No. 95-M	Federal Incentive Tracker (Continued)
Original	Sheet No. 95-C.3	Power Cost Adjustment Clause (Continued)
Original	Sheet No. 95-E.10	Power Cost Adjustment Clause (Continued)
32 nd Revision	Sheet No. 120-B	Electricity Conservation Service Rider (Continued)
19 th Revision	Sheet No. 129-D	Low Income Program (Continued)
9 th Revision	Sheet No. 137-G	Temporary Customer Charge or Credit (Continued)
10 th Revision	Sheet No. 140-I	Property Tax Tracker (Continued)
3 rd Revision	Sheet No. 141X-G	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141Z-G	Unprotected Excess Deferred Income Tax (UP EDIT) Reversals Rate Adjustment (Continued)

Purpose of Filing and Background

The purpose of this filing is for PSE to incorporate a smart street lighting system that includes software and new smart lighting control hardware to enhance PSE’s existing Company owned Light Emitting Diode (“LED”) lighting services within tariff schedule numbers 51 and 53. Currently, PSE has limited information regarding the status or performance of the approximately 100,000 street lights owned by PSE, except through customer outage calls or in-person inspections. This results in PSE rolling a truck to individual lights in response to an outage call to diagnose a failure, and often a secondary trip is required to fix the problem. Enhanced remote management with a smart street lighting system means performance issues will be detected automatically, leading to the generation of a detailed work order containing all necessary information for the repair crews to be dispatched promptly and to complete their work efficiently. The smart street lighting system is expected to reduce operating expense that will accrue over time from reduced truck rolls, fewer street light outage calls, and improved asset management.

The Customer Experience

Large municipal Customers have asked PSE to provide smart lighting controls, expressing interest in the energy and cost savings with enhanced efficiency controls. The smart street lighting system enables a variety of functions PSE will implement to benefit LED street light service Customers, including control of lighting intensity to boost energy efficiency and metering of street lights using the metrology in the controls.

The proposed new Schedules 51 and 53 smart LED lighting service will be available on or after November 15, 2021. After the successful installation of a smart street light control, Customers taking service on Schedules 51 and 53 will be migrated to smart LED lighting service. For the

purposes of billing, all lighting services provided to a single Customer may be considered a single premise. Smart LED lights and controls will be treated as an entire set of networked components (hardware and embedded software) installed in the field that function together to adaptively control and remotely monitor luminaires, and may include such functions as scheduling, metering, dimming, and diagnostics.

The proposed Schedules 51 and 53 Smart LED Light Charges include both Monthly Basic Charge for each of the smart LED lights and a per kWh based Energy Charge. In comparison, the existing rate structure of flat rate monthly billing under Schedules 51 and 53 includes one line item per schedule per lamp size for each type of light. This results in an easy-to-read bill with a line item detailing the total quantity of street light installations for each wattage bracket, and the associated flat rate listed for each type of light. While the smart street lighting system enables PSE to bill the measured energy for each of the LED street lights, it's important for monthly bills to remain concise, informative, and consistent as many Customers may have a combination of standard and smart street lights. Consolidating the monthly usage for smart street lights within each rate category will result in lower administrative and printing costs for PSE and provide a more readable monthly bill for Customers, much like the collective billing capabilities with which many of these Customers are already familiar. For more details about specific smart street light usage within a consolidated premise, PSE can provide more granular data per smart street light installation upon request.

Deployment

PSE has partnered with its existing metering service provider Landis+Gyr to support its smart street lighting system capabilities, and will utilize PSE's existing Gridstream[®] advanced metering infrastructure network to facilitate two-way communication through a secure central operating platform allowing PSE to remotely monitor and manage the performance of each smart street LED light in real time. Over the next five years, PSE plans to install a minimum of 25,000 smart street light controls.

PSE will install smart lighting controls as part of naturally occurring customer-driven LED installations and conversions of existing PSE-owned high pressure sodium street lights to enhance the operational efficiency, reliability, and performance of PSE's street light system. The data collected will be integrated with PSE's billing system to generate measured energy charges.

Smart Street Light Control Test Procedures

PSE will require the equipment manufacturer to provide certified final production test results for each new smart light control, in accordance with the latest revision of ANSI C12.1, American National Standard for Electric Meters Code for Electricity Metering published by American National Standards Institute. PSE will accept, record, and retain that manufacturer test of the accuracy information.

Each year, per WAC 480-100-343, PSE will randomly select a statistical sample of smart light controls from its inventory, conduct a numerical analysis based on the latest revision of

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ANSI/ASQC-Z1.9, Section B, Part II¹ to validate device accuracy, and record and retain that information.

The tariff sheets described herein reflect an issue date of October 1, 2021, and an effective date of November 15, 2021. Notice and posting of proposed tariff changes, as required by law and the Commission's rules and regulations, is being completed in accordance with WAC 480-100-193(1). Notice to individual customers under the provisions of WAC 480-100-194 will be provided within 30 days of the customer's rate being migrated to Smart LED Lighting Charges.

Please contact Veronica Martin at (425) 457-5624 or veronica.martin@pse.com, or Julie Waltari at (425) 456-2945 or julie.waltari@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
Puget Sound Energy
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cc: Lisa Gafken, Public Counsel
Sheree Carson, Perkins Coie

Attachments:

Electric Tariff Sheets (listed above)

Cost of Service Work Paper

¹ American National Standard, Sampling Procedures and Tables for Inspection by Variables for Percent Nonconforming, Section B Variability Unknown—Standard Deviation Method, Part II Double Specification Limit