

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

January 16, 2024

Filed Via Web Portal

Received Records Management Jan 16, 2024

Kathy Hunter, Acting Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

## RE: Advice No. 2024-01 Puget Sound Energy's Electric Tariff Revision

Dear Executive Director Hunter:

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" or the "Company"):

1 <sup>st</sup> Revision Sheet No.	611 Residential Battery En	nergy Storage System Services
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The purpose of this filing is to revise the Availability of PSE's Residential Battery Energy Storage System Services ("BESS"). While BESS was initially available to customers of the Company taking service under Time-of-Use Schedule 307, recently identified metering and technical limitations render it unfeasible for batteries enrolled in BESS to also be taking service under Schedule 307.

Currently, while PSE is able to ingest and store interval data on the energy delivered to the customer from the PSE grid, it does not have the technical ability to ingest and store interval data on the energy that a customer returns to the PSE grid. Customers who take service under Schedule 307 are billed a Time-of-Use Energy Charge which shall be an amount equal to the sum of Peak and Off-Peak Energy Charges, meaning that the amount of their Energy Charge will vary depending on the time of day in which their energy is consumed. This presents a technical limitation as PSE is not able to calculate participation incentives at the Time-of-Use customer's n-Peak and Off-Peak rates. PSE is currently exploring a technical solution and expects that it will ultimately be able to overcome this technical limitation, although an exact timeline for deployment of such a solution is currently unknown.

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Additionally, this filing clarifies tariff schedule language that customers taking service under electric Schedule 327 are not eligible for BESS.

PSE engaged with Commission Staff and the Conservation Resources Advisory Group ("CRAG") on the topic of the proposed tariff schedule revisions included in this filing. CRAG members were given the opportunity to review the draft tariff schedule revisions and to provide feedback beginning on December 27, 2023. PSE did not receive written comments in response to this planned filing.

The tariff sheet described herein reflects an issue date of January 16, 2024, and effective date of February 23, 2024. 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 <u>veronica.martin@pse.com</u> for additional information about this filing. If you have any other questions, please contact me at <u>birud.jhaveri@pse.com</u>.

Sincerely,

/s/ Bírud D. Jhaverí

Birud D. Jhaveri Director, Regulatory Affairs Puget Sound Energy PO Box 97034, BEL10W Bellevue, WA 98009-9734 Birud.Jhaveri@pse.com

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

Attachments: Electric Tariff Sheet (listed above)