



Puget Sound Energy
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September 19, 2024

Received
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 Sep 19, 2024

Filed Via Web Portal

Jeff Killip, Executive Director and Secretary
 Washington Utilities and Transportation Commission
 621 Woodland Square Loop SE
 Lacey, WA 98503

**RE: Advice No. 2024-38
 Puget Sound Energy’s Electric Tariff Revision**

Dear Executive Director Killip:

Pursuant to RCW 80.28.060, 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”):

4 th Revision	Sheet No. 611	Schedule 611 Residential Battery Energy Storage System Services
1 st Revision	Sheet No. 611-A	Schedule 611 Residential Battery Energy Storage System Services (Continued)
2 nd Revision	Sheet No. 611-C	Schedule 611 Residential Battery Energy Storage System Services (Continued)
Original	Sheet No. 640	Schedule 640 Distributed Energy Resources Technology Demonstration
Original	Sheet No. 640-A	Schedule 640 Distributed Energy Resources Technology Demonstration (Continued)
2 nd Revision	Sheet No. 667	Schedule 667 Purchases From Distributed Solar Photovoltaic Systems
1 st Revision	Sheet No. 667-A	Schedule 667 Purchases From Distributed Solar Photovoltaic Systems (Continued)
2 nd Revision	Sheet No. 667-D	Schedule 667 Purchases From Distributed Solar Photovoltaic Systems (Continued)
Original	Sheet No. 683	Schedule 683 Distributed Energy Resources Products and Services
Original	Sheet No. 683-A	Schedule 683 Distributed Energy Resources Products and Services (Continued)
Original	Sheet No. 683-B	Schedule 683 Distributed Energy Resources Products and Services (Continued)
Original	Sheet No. 683-C	Schedule 683 Distributed Energy Resources Products and Services (Continued)

Original	Sheet No. 683-D	Schedule 683 Distributed Energy Resources Products and Services (Continued)
1 st Revision	Sheet No. 686-A	Schedule 686 Solar Energy Credit Multi-Occupant Allocation Service (Continued)
1 st Revision	Sheet No. 686-B	Schedule 686 Solar Energy Credit Multi-Occupant Allocation Service (Continued)
1 st Revision	Sheet No. 686-C	Schedule 686 Solar Energy Credit Multi-Occupant Allocation Service (Continued)
1 st Revision	Sheet No. 686-D	Schedule 686 Solar Energy Credit Multi-Occupant Allocation Service (Continued)
1 st Revision	Sheet No. 686-E	Schedule 686 Solar Energy Credit Multi-Occupant Allocation Service (Continued)
Original	Sheet No. 686-F	Schedule 686 Solar Energy Credit Multi-Occupant Allocation Service (Continued)

The purpose of this tariff filing is to simplify and further expand PSE’s portfolio of enhanced distributed energy resources (“DER”) products and services to meet expanding customer expectations. This includes revisions to several existing DER tariff schedules and the addition of two new tariff schedules to compliment the DER products and services that have been approved by the Washington Utilities and Transportation Commission. PSE believes that these proposed changes and the new additions will further accelerate the transition to a cleaner energy future and advance clean energy in Washington State as detailed in the Company’s Commission-approved Clean Energy Implementation Plan (“CEIP”)¹.

As PSE has learned from the launch of its solar, storage, and demand response programs, customers expect the Company to provide a diverse portfolio of DER products and services, such as access to local clean energy sources and benefits from grid interactive devices that provide value to both the customer and utility. This includes removing barriers for PSE’s Equity-Focused Customers, defined as a customer that is part of Named Communities or a customer that shares demographic characteristics with customer in Named Communities and Community-Based Organizations, government agencies, and tribal entities that serve them.

With the approval of these proposed DER products and services, PSE can help reduce carbon emissions, increase access to clean energy technology, address market gaps, ensure equitable outcomes, and better serve all customer needs.

Summary of Proposed Tariff Schedule Changes and Additions

The following section provides a summary of the proposed tariff revisions and the new DER tariff schedules:

- Schedule 611, Residential Battery Energy Storage System Services
The proposed revisions to this schedule include removal of definitions now captured in the new Schedule 683.
- Schedule 640, Distributed Energy Resources Technology Demonstration

¹ Final Order 08 Approving CEIP Subject to Conditions in Docket UE-210795

The proposed new tariff schedule is to make available limited-scale DER technology demonstration projects, in consultation with Commission Staff, to identify, research, and test commercially available technologies or services that differ significantly from those already qualifying for funding under other existing PSE DER schedules. Key outcomes of such demonstrations can inform PSE of technical feasibility, operational requirements, system impacts, market/customer readiness, and/or community benefits. For instance, demonstrating how smart electric panels, smart breakers or other electrical system integration technologies might reduce costs and deliver multi-dimensional value streams for the customer and the system.

- Schedule 667, Purchases From Distributed Solar Photovoltaic Systems

The proposed revisions to this schedule include removal of definitions now captured in the new Schedule 683, and removes the Company's electric demand response programs and services ineligibility criteria for this Schedule.

- Schedule 683, Distributed Energy Resources Products and Services

The proposed new tariff schedule sets the overall terms and conditions for DER products and services and will be applicable to all DER products and services described under Electric Service Schedules numbered between 601 and 699. The definitions triggered the revisions proposed in Schedules 611, 667, and 686 tariff sheets.

- Schedule 686, Solar Energy Credit Multi-Occupant Allocation Service

The proposed revisions to this tariff schedule include removal of definitions now captured in the new Schedule 683 and adds term and condition H to address a stop and start service scenario where new and old occupants both do not provide timely notification resulting in incorrect allocation.

Equity-focused Community Engagement

PSE is increasing procedural equity in its product design by giving Named Communities and their service providers a seat at the design table. From September 2022 through May 2023, PSE conducted community engagement on future DER products.

Across the topics of batteries, solar and demand response, the Company engaged over 250 low-income residents and over 40 agencies, municipalities, organizations, and tribal entities who serve those aforementioned residents in 1:1 interviews, focus groups, workshops, and surveys to hear from them directly about the benefits and barriers customers may face when it comes to DER products, and how future product design can alleviate these barriers and maximize the desired benefits.

The services proposed addresses multiple points of feedback:

- The benefits of solar are difficult for renters to access because they don't have ownership or decision rights over their roof. This lack of access is amplified for residents of multi-occupant buildings. Customers asked for PSE to create programs that entice property owners to install solar, which residents may then benefit from.
- Upfront costs associated with asset procurement and installation, along with the ongoing maintenance, were consistently highlighted as a key barrier for affordable housing

providers. There was a clear ask for financial incentives that substantially offset or entirely removed the financial costs these customers may encounter when participating in solar products.

- Reduction in energy bills was consistently highlighted as the primary benefit sought out by customers in named communities when considering participating in solar products.

Interested Party Feedback

PSE would like to thank the interested parties who have provided comments, questions, and their experience in the development of this tariff filing. These groups were comprised of representatives from named communities and their service providers, as well as the Conservation Resources Advisory Group (“CRAG”), and local solar photovoltaic and battery energy system installers. The following sections detail those engagements and how PSE incorporated the input from these groups to help inform this tariff filing.

Conservation Resources Advisory Group (“CRAG”) Engagement

Engagement with the CRAG on the topic of the tariff schedules included in this filing have been comprised of:

- Presentation and discussion of the Distributed Energy Resources product roadmap, and overview of Schedule 640 and Schedule 683 desired outcomes and benefits at a CRAG meeting on August 7, 2024.
- Distribution and preview of the proposed draft tariff Schedules 640, 683 and revisions to tariff Schedules 611, 667, and 686 pertaining to this filing to the CRAG via electronic mail on August 13, 2024, for a 30-day review and comment period concluding on September 11, 2024;

As shown in the above timeline, CRAG members were given the opportunity to provide feedback on the initial product offerings and design concepts beginning August 7, 2024, and to review and provide comment on the draft tariff sheets beginning August 7, 2024. PSE received no written comments from CRAG members by September 11th, which concluded the 30 day review period.

Cost Recovery

The costs for the implementation of these proposed new electric service schedules will be recovered through the Commission-approved Schedule 141CEI Clean Energy Implementation Tracker².

Reporting

These services support specific actions of the Company’s Clean Energy Implementation Plan (CEIP). Any progress towards CEIP goals made by Schedule 611, Schedule 640, Schedule 667, and Schedule 686 will be reflected in the CEIP reporting.

Conclusion

² Docket UE-230591, allowed to go into effect as filed by the Commission on August 24, 2023

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As detailed in the CEIP, the Company is committed to creating a cleaner energy future as we proactively work to do our part to support Washington's clean energy goals. The Company believes the revisions to electric service Schedules 611, 667 and 686 along with the new proposed electric service Schedule 640 and 683 are positive steps toward meeting that objective and will help accelerate clean energy goals in Washington State, enable benefits to all customers, and alleviate barriers and maximize the desired benefit for its Equity-Focused Customers. The Company thanks the Commission, its customers, and valued interested parties for their support as PSE takes the next steps in executing on the strategies laid out in its CEIP.

The tariff sheets described herein reflect an issue date of September 19, 2024, and an effective date of October 25, 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 veronica.martin@pse.com for additional information about this filing. If you have other questions, please contact me at birud.jhaveri@pse.com.

Sincerely,

/s/ Birud D. Jhaveri

Birud D. Jhaveri
Director, Regulatory Affairs
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cc: Tad O'Neill, Public Counsel
Sheree Carson, Perkins Coie

Attachments: Electric Tariff Sheets (listed above)