



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

**RE: Advice No. 2025-21
Puget Sound Energy’s Natural Gas Tariff Revision**

Dear Executive Director Killip:

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-2, tariff for natural gas service of Puget Sound Energy (“PSE” or the “Company”):

23 rd Revision	Sheet No. 1129	Low Income Program
8 th Revision	Sheet No. 1129-A.1	Low Income Program (Continued)
25 th Revision	Sheet No. 1129-B	Low Income Program (Continued)

The purpose of this tariff filing is to increase the Annual Cap for total benefits available to customers for the remainder of the 2024-2025 Low Income Program Year as well as to increase rates to recover the increase in the Annual Cap. The benefits under Schedule 129 are available to PSE customers meeting the criteria described within that Schedule and are used to offset charges on their bills.

Last program year, PSE experienced a large increase in the volume of applications received for its bill assistance programs. This large increase was attributed to the move to self-attestation and marketing efforts related to the launch of the Bill Discount Rate. With that large increase in applications, PSE determined that additional funding would be needed to provide PSE HELP grants to all of the applications received in the program year. PSE and the Low Income Advisory Committee (“LIAC”) explored several forecast methods together before selecting a forecast method based on the average number of applications received per week in that program year. PSE then increased the cap for the last program year based on that forecast.

Prior to the beginning of the current program year, PSE determined the revenue requirement for the 2024-2025 Low Income Program Year based on the total revenue requirement for the 2023-2024 Low Income Program Year (which included a step increase as discussed above) with small

adjustments made, such as to account for rate increases. Setting the revenue requirement in this way has historically worked well. Considering the step increase taken in the prior year, the Company and the LIAC believed this method would produce a sound forecast for the current program year.

However, even with last year's step increase, PSE has again seen a large increase in the volume of applications received so far this program year over the last program year, leading to a depletion of funds at a greater rate than anticipated. Therefore, in order to ensure that customer needs in the Home Energy Lifeline Program ("HELP") are met, PSE is seeking additional funding for the remainder of the Program Year.

PSE has worked with its LIAC leading up to this filing. On February 20, 2025, the Company presented to the LIAC the current standing of PSE HELP for the remainder of the Program Year and the anticipated need for additional funding. The LIAC had the opportunity to provide feedback and ask questions, and the LIAC indicated support for this tariff filing. The forecasted additional funding need uses the same forecast method, the average number of applications received per week in the current program year that was used for last program year's mid-year increase.

Overall, this proposal represents a total revenue requirement increase of \$42.6 million, with \$7.8 million of that for natural gas customer benefits. The collection of this revenue requirement is being spread over the remainder of the current HELP program year – May 2025 through September 2025 – to allow for immediate access to funding. The average increase for all natural gas customers affected by this tariff change is 3.10 percent increase in overall bills. A typical residential natural gas customer on Schedule 23 using 64 therms per month would experience an increase of \$3.54 per month or 3.67 percent.

RCW 80.28.425(2) outlines a five percent threshold relative to a utility total revenue requirement for tariff schedules that reduce energy burden of low-income residential customers. PSE analysis shows that the level of recovery for spending on tariff schedules that reduce the energy burden of low income residential customers, including this tariff filing, are currently measured at 4.4% (Electric) and 2.5% (Gas) of the total revenue requirement approved by the Commission. Given RCW 80.28.425(2) also requires low income assistance to increase by double the percentage increase in residential base rates approved in each year of a MYRP, PSE estimates these calculations to increase to 5.3% (Electric) and 2.8% (Gas) in October 2025 for the next program year. As PSE funding for ratepayer-funded low-income programs will exceed the 5% threshold for the next program year, PSE would appreciate a discussion and guidance from the Commission in advance of the Company's next low income filing, in September 2025, on what utilities should be expected to do when that calculation crosses the 5% limit.

Bill assistance programs such as PSE's Bill Discount Rate ("BDR"), PSE Home Energy Lifeline Program ("HELP"), the Low Income Home Energy Assistance Program ("LIHEAP"), Past-due Bill Forgiveness (an Arrearage Management Plan which launched in October 2025), and the Salvation Army Warm Home Fund ("WHF") are available to qualified customers who need help with their energy bills. PSE customers can go to pse.com/assistance or call 1-888-225-5773 to learn if they are eligible. Payment plans are also available.

Jeff Killip, Executive Director and Secretary

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The tariff sheets described herein reflect an issue date of March 28, 2025, and effective date of May 1, 2025. 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 480-90-193. Notice to the public under the provisions of WAC 480-90-194 will be provided within 30 days of the May 1, 2025, effective date.

Please contact Veronica Martin at veronica.martin@pse.com for additional information about this filing. If you have any other questions, please contact me at birud.jhaveri@pse.com.

Sincerely,

/s/ Birud D. Jhaveri

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

Attachments: Natural Gas Tariff Sheets (listed above)
Work Papers