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

February 21, 2023

Filed Via Web Portal

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

**Re: Advice No. 2023-06** 

PSE's Natural Gas Tariff Filing – Filed Electronically

Dear Ms. Maxwell:

Pursuant to RCW 80.28.060 and WAC 480-80-101 and WAC 480-80-105(1)(c), please find enclosed for filing the following proposed revisions to the WN U-2, tariff for natural gas service of Puget Sound Energy ("PSE"):

115 <sup>th</sup> Revision	Sheet No. 101	Schedule 81	Tax Adjustment
152 <sup>nd</sup> Revision	Sheet No. 101-A	Schedule 81	Tax Adjustment (Continued)
30 <sup>th</sup> Revision	Sheet No. 101-B	Schedule 81	Tax Adjustment (Continued)
14 <sup>th</sup> Revision	Sheet No. 101-C	Schedule 81	Tax Adjustment (Continued)

The purpose of this filing is to revise natural gas Schedule 1 Tax Adjustment to incorporate the increased Utility and Transportation Commission ("UTC") regulatory fee for certain utilities that became effective on June 9, 2022, in RCW 80.24.010; and certain outcomes of Order 24/10 of the consolidated Dockets UE-220066, UG-220067, and UG-210918 on December 22, 2022 ("2022 GRC"). Revised tariff sheets regarding electric Schedule 81, Tax Adjustment, are being filed concurrently under Advice No. 2023-05.

Per Schedule 1, Section 2, Tax Adjustment, the UTC allows PSE to increase the amount PSE charges its customers to recover the cost of a municipal utility tax levy and the additional expenses associated with collection of the municipal utility tax. The effect of a municipal utility tax rate as shown in Schedule 1 reflects both the municipal utility tax levy rate and the associated adjustments.

PSE does not profit from passing through a municipal utility tax and these grossed up adjustments. PSE incurs additional taxes and expenses as a result of the collection of a Ms. Amanda Maxwell, Executive Director and Secretary February 21, 2023
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municipal utility tax levy. With each increase in gross revenue, additional tax and fee amounts become payable. Therefore, the effect of the tax rate in a municipal utility tax ordinance needs to be grossed up to reflect Washington State Public Utility Tax per RCW 82.16, and Washington UTC regulatory fee per RCW 80.24.010, and additional bad debt expenses associated with the collection of the municipal utility tax for the city. The following table summarizes these

gross up adjustments:

Siese up unjustilities						
Natural Gas						
	Input Used in The	Input Used in The				
	Calculation of Proposed	Calculation of Current	Change			
	Schedule 1 Rates	Schedule 1 Rates				
Bad Debts	0.420%	0.512%	-0.092%			
UTC Regulatory Fee	0.400%	0.200%	0.200%			
State Utility Tax	3.852%	3.852%	0.000%			
Sum	4.672%	4.564%	0.108%			

The updated natural gas bad debt expense ratio is 0.420%, which is a decrease of 0.092% from the 0.512% that was incorporated into the current rates. Washington State Senate Bill 5634 revised the UTC regulatory fee under RCW 80.24.010 from 0.200% to 0.400%. Depending on the treatment of UTC regulatory fee, bad debt expenses, and tax expenses in each municipality's utility tax ordinance and the result of rounding the calculation to six decimal places, the effects of these adjustments changes varied among the 71 affected cities.

The impact of the proposed change on a residential bill (at 68 Therm/month) for 70 of the 71 cities is \$0.01/month. City of Federal Way residence would experience an increase of \$0.02/month. There is no estimated residential impact for customers use 68 Therms/month in the City of Woodinville due to rounding. Exhibit A to this letter summarizes, for the 71 affected cities, the rate changes, and the estimated changes on annual revenue and monthly residential customer impact.

Bill assistance programs are available to qualified customers who need help with their energy bills. Customers can go to pse.com or call 1-888-333-9882 to learn if they are eligible. Payment plans are also available to all PSE customers.

PSE respectfully requests an exemption from WAC 480-90-194(4)(d) which requires the publication of proposed tariff changes to include a comparison of current and proposed rates. The effective tax rates for 71<sup>1</sup> out of the 72 cities in Schedule 1 are subject to change in this filing, and the presentation of such a large amount of data may create confusion for customers. To provide the target information for the customers in each of the 71 cities, in conjunction to the newspaper notices, PSE has set up a website where customers can look up the specific change associated with their city at https://www.pse.com/pages/rates/news-and-filings. This request has been discussed with Commission Staff prior to this filing.

<sup>&</sup>lt;sup>1</sup> The effective tax rate for the City of Puyallup was just updated in Docket UG-220887.

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The tariff sheets described herein reflect an issue date of February 21, 2023, and an effective date of March 24, 2023. Posting of the proposed tariff change for public inspection and review, as required by law and the Commission's rules and regulations, is being completed in accordance with WAC 480-90-193(1). With the exception of WAC 480-90-194(4)(d), notice to the public under the provisions of WAC 480-90-194 will be provided on February 21, 2023, within 30 days of the March 24, 2023 effective date.

Please contact 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 Exhibit A: Summary of Effective Tax Rate and Estimated Annual Revenue Changes and Monthly Residential Customer Impacts