

December 27, 2022

**UE-220066**

***Filed Via Web Portal***

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

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Records Management  
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State Of WASH.  
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COMMISSION

**Re: Docket UE-220066 (Advice No. 2022-29) – Do Not Redocket  
PSE’s Electric Tariff Revision - Filed Electronically**

Dear Ms. Maxwell:

Pursuant to RCW 80.28.060, WAC 480-80-101 and -105, and WAC 480-07-880, enclosed are copies of the following revised tariff sheets and Exhibit A-1 in compliance with the Commission’s Order Nos. 24/10.<sup>1</sup>

Puget Sound Energy (“PSE” or the “Company”) accepts all conditions of approval set by the Orders, as noted in paragraphs 104, 236, 243, 262, 410, 450, 508 and 510.

**WN U-60, Tariff G, Electric Service:**

45th Revision	Sheet No. 2-A	Index to Rate Schedules (Continued)
14th Revision	Sheet No. 2-B	Index to Rate Schedules (Continued)
1st Revision	Sheet No. 2-C	Index to Rate Schedules (Continued)
38th Revision	Sheet No. 7	Residential Service
13th Revision	Sheet No. 7-B	Master Metered Residential Service (Continued)
36th Revision	Sheet No. 24	General Service
26th Revision	Sheet No. 25	Small Demand General Service
27th Revision	Sheet No. 26	Large Demand General Service
4th Revision	Sheet No. 26-B	Large Demand General Service (Continued) [Conj. Demand]
32nd Revision	Sheet No. 29	Seasonal Irrigation & Drainage Pumping Service
38th Revision	Sheet No. 31	Primary General Service
4th Revision	Sheet No. 31-B	Primary General Service (Continued) [Conj. Demand]

<sup>1</sup> Final Order Rejecting Tariff Sheets; Approving Settlements, with Conditions; Authorizing and Requiring Compliance Filing (“Orders 24/10”, “Orders”), in consolidated Dockets UE-220066, UG-220067 and UG-210918

29th Revision	Sheet No. 43-A	Interruptible Primary Service for Total-Electric Schools (Continued)
37th Revision	Sheet No. 46	High Voltage Interruptible Service
18th Revision	Sheet No. 46-A	High Voltage Interruptible Service (Continued)
36th Revision	Sheet No. 49	High Voltage General Service
36th Revision	Sheet No. 50	Limited Street Lighting Service
8th Revision	Sheet No. 51-B	LED (Light Emitting Diode) Lighting Service (Continued)
8th Revision	Sheet No. 51-C	LED (Light Emitting Diode) Lighting Service (Continued)
9th Revision	Sheet No. 51-D	LED (Light Emitting Diode) Lighting Service (Continued)
27th Revision	Sheet No. 52-A	Custom Lighting Service Company Owned (Continued)
12th Revision	Sheet No. 52-B	Custom Lighting Service Company Owned (Continued)
26th Revision	Sheet No. 53-A	Street Lighting Service Sodium Vapor (Continued)
23rd Revision	Sheet No. 53-B	Street Lighting Service Sodium Vapor (Continued)
17th Revision	Sheet No. 53-C	Street Lighting Service Sodium Vapor (Continued)
8th Revision	Sheet No. 53-G	Street Lighting Service Sodium Vapor (Continued)
6th Revision	Sheet No. 53-H	Street Lighting Service Sodium Vapor (Continued)
38th Revision	Sheet No. 54	Customer-Owned Street Lighting Energy Service Sodium Vapor
13th Revision	Sheet No. 54-A	Customer-Owned Street Lighting Energy Service Sodium Vapor (Continued)
9th Revision	Sheet No. 54-B	Customer-Owned Street Lighting Energy Service Sodium Vapor (Continued)
39th Revision	Sheet No. 55	Area Lighting Service
20th Revision	Sheet No. 55-A	Area Lighting Service (Continued)
35th Revision	Sheet No. 57	Continuous Lighting Service
34th Revision	Sheet No. 58	Flood Lighting Service
23rd Revision	Sheet No. 58-A	Flood Lighting Service (Continued)
9th Revision	Sheet No. 58-B	Flood Lighting Service (Continued)
9th Revision	Sheet No. 58-C	Flood Lighting Service (Continued)
41st Revision	Sheet No. 95	Power Cost Adjustment Clause
16th Revision	Sheet No. 95-A	Power Cost Adjustment Clause (Continued)
18th Revision	Sheet No. 95-B	Power Cost Adjustment Clause (Continued)
17th Revision	Sheet No. 95-C	Power Cost Adjustment Clause (Continued)
10th Revision	Sheet No. 95-C.1	Power Cost Adjustment Clause (Continued)
10th Revision	Sheet No. 95-C.2	Power Cost Adjustment Clause (Continued)
1st Revision	Sheet No. 95-C.3	Power Cost Adjustment Clause (Continued)
17th Revision	Sheet No. 95-D	Power Cost Adjustment Clause (Continued)
17th Revision	Sheet No. 95-E	Power Cost Adjustment Clause (Continued)
8th Revision	Sheet No. 95-E.1	Power Cost Adjustment Clause (Continued)
8th Revision	Sheet No. 139-E	Voluntary Long Term Renewable Energy Purchase Rider (Continued)
Original	Sheet No. 141A	Energy Charge Credit Recovery Adjustment

Original	Sheet No. 141A-A	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-B	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-C	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-D	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-E	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-F	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-G	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-H	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141A-I	Energy Charge Credit Recovery Adjustment (Continued)
Original	Sheet No. 141COL	Colstrip Adjustment Rider
Original	Sheet No. 141COL-A	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-B	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-C	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-D	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-E	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-F	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-G	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-H	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-I	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141COL-J	Colstrip Adjustment Rider (Continued)
Original	Sheet No. 141N	Rates Not Subject to Refund Rate Adjustment
Original	Sheet No. 141N-A	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-B	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-C	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-D	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-E	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-F	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-G	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-H	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-I	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141N-J	Rates Not Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R	Rates Subject to Refund Rate Adjustment
Original	Sheet No. 141R-A	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-B	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-C	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-D	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-E	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-F	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-G	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-H	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-I	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-J	Rates Subject to Refund Rate Adjustment (Continued)

Original	Sheet No. 141R-K	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-L	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-M	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-N	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-O	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-P	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-Q	Rates Subject to Refund Rate Adjustment (Continued)
Original	Sheet No. 141R-R	Rates Subject to Refund Rate Adjustment (Continued)
12th Revision	Sheet No. 142	Revenue Decoupling Adjustment Mechanism
12th Revision	Sheet No. 142-A	Revenue Decoupling Adjustment Mechanism (Continued)
9th Revision	Sheet No. 142-B	Revenue Decoupling Adjustment Mechanism (Continued)
9th Revision	Sheet No. 142-C	Revenue Decoupling Adjustment Mechanism (Continued)
13th Revision	Sheet No. 142-D	Revenue Decoupling Adjustment Mechanism (Continued)
9th Revision	Sheet No. 142-E	Revenue Decoupling Adjustment Mechanism (Continued)
9th Revision	Sheet No. 142-F	Revenue Decoupling Adjustment Mechanism (Continued)
9th Revision	Sheet No. 142-G	Revenue Decoupling Adjustment Mechanism (Continued)
Original	Sheet No. 142-G.1	Revenue Decoupling Adjustment Mechanism (Continued)
Original	Sheet No. 142-G.2	Revenue Decoupling Adjustment Mechanism (Continued)
Original	Sheet No. 142-G.3	Revenue Decoupling Adjustment Mechanism (Continued)
Original	Sheet No. 142-G.4	Revenue Decoupling Adjustment Mechanism (Continued)
Original	Sheet No. 142-G.5	Revenue Decoupling Adjustment Mechanism (Continued)
Original	Sheet No. 142-G.6	Revenue Decoupling Adjustment Mechanism (Continued)
Original	Sheet No. 142-G.7	Revenue Decoupling Adjustment Mechanism (Continued)
15th Revision	Sheet No. 448-I	Power Supplier Choice (Continued)
16th Revision	Sheet No. 449-I	Retail Wheeling Service (Continued)

On January 31, 2022, PSE filed with the Commission revisions to its Tariff WN U-60, Tariff G, Electric Service, and Tariff WN U-2, Natural Gas, which were assigned Dockets UE-220066 and UG-220067, respectively. On February 10, 2022, the Commission suspended the tariff revisions, consolidated Dockets UE-220066 and UG-220067, and initiated PSE's general rate case ("GRC Dockets").

The primary purpose of this filing is to comply with the portion of the Orders that addresses electric rates. PSE is submitting a separate filing of its natural gas tariff sheets in compliance with the Orders under the Company's Advice No. 2022-30. The attached revised electric tariff sheets reflect the form and rates authorized by these Orders. These tariff sheets reflect an overall dollar amount increase of \$389.5 million in 2023 and \$33.3 million in 2024; this represents overall dollar percentage increases of 16.95% and 1.26%, respectively.

This compliance filing contains three updates from the Company's response to Bench Request 02 ("BR 2").

- This compliance filing contains the 2023 Power Cost update agreed to in the Revenue Requirement Settlement,<sup>2</sup> which results in an increase of \$179.4 million in revenue requirement in 2023 based upon \$166.5 million in additional power costs.<sup>3</sup> The vast majority, or \$135.8 million of the \$166.5 million increase in power costs, is associated with the impact of Washington's Climate Commitment Act ("CCA")<sup>4</sup> on the dispatch of PSE's natural gas and coal fueled generation resources. Specifically, the cost of CCA allowances result in a reduction in output from these resources and a corresponding increase in wholesale market purchases combined with a decrease in wholesale market sales, driving a significant increase to power costs attributable to compliance with the CCA. To be clear, these impacts do not include the actual cost of the CCA allowances themselves, only their impact on PSE's ability to cost-effectively dispatch its resources to mitigate costs for its customers. The remaining \$30.7 million impact on power cost (i.e., \$166.5 - \$135.8) are associated with the net impacts of updates to natural gas prices and the costs (benefits) of executed hedge contracts, updates to the costs associated with PSE's Mid-C hydroelectric contracts and the inclusion of two new power purchase agreements for winter peak capacity, all of which will be subject to further review in PSE's 2023 Power Cost Adjustment Mechanism Annual Compliance Report filing made next April.<sup>5</sup>
- Part of the Revenue Requirement Settlement is a future compliance filing to update power costs as of January 1, 2024.<sup>6</sup> Therefore, as part of the Power Cost update in this compliance filing, PSE has updated the 2024 power costs to remain consistent with 2023 power costs on a load neutral basis.<sup>7</sup> This change results in a revenue decrease for 2024 of an additional \$5 million over the 2023 increase. Additionally, the 2024 power costs included in this compliance filing do not take into account known changes in power costs at this time, such as the end of the Northwest Pipeline refund,<sup>8</sup> as these costs will also be updated as part of the aforementioned 2024 Power Cost update filing.
- Additionally, in 2023, a \$13.2 million increase to electric O&M applied in the

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<sup>2</sup> The Settlement Stipulation and Agreement on Revenue Requirement and All Other Issues Except Tacoma LNG and PSE's Green Direct Program ("Revenue Requirement Settlement") is included as Appendix A to the Orders. See ¶28 of the Revenue Requirement Settlement and ¶257 of the Orders.

<sup>3</sup> The \$179.4 million is the result of grossing up the \$166.5 million change in power costs for revenue taxes and fees.

<sup>4</sup> RCW 70A.65.260 and WAC Chap. 173-446.

<sup>5</sup> See ¶30 of the Revenue Requirement Settlement.

<sup>6</sup> *Id.* at ¶28 and ¶257 of the Orders.

<sup>7</sup> In other words, the 2023 dollar per MWh for variable power costs was kept the same for 2024. Although this treatment results in a change to revenue, there is no impact to the overall *rate* change. The amount to include for 2024 power costs is being determined in this way as it results in no *rate* change associated with power costs which is reasonable as power costs will be updated in the 2024 Power Cost Update per paragraph 28b in the Revenue Requirement settlement. Therefore, the 2024 rates set in the current compliance filing will never actually be in effect but act as a "placeholder" until the formal update is filed for rates effective in 2024.

<sup>8</sup> Revenue Requirement Settlement ¶55

Settlement on which BR 2<sup>9</sup> was based has been removed which reduces the revenue requirement in this compliance filing as the corresponding actual load adjustment has been incorporated into the updated power costs discussed in the previous bullet. The 2024 net revenue change increases by \$500,000 for this item.

- Finally, BR 2 did not incorporate the update to the Green Direct Energy Charge Credit in Schedule 139 agreed to in the Green Direct Settlement.<sup>10</sup> This update results in a decrease to the credit by \$1.3 million in 2023 and \$0.6 million in 2024 for Green Direct customers. A corresponding and offsetting change is made to Schedule 141A which is the schedule that recovers the cost of the Green Direct Energy Charge Credit. These changes, along with other rate rounding differences, account for a decrease to the net revenue change of \$100,000 in 2023 and \$700,000 in 2024 when compared to BR 2.

The Company has included the Colstrip Adjustment Rider reflected as Schedule 141COL.

Additionally, PSE requests review and separate approval of Exhibit A-1, PSE's Power Cost Baseline Rate, which is necessary for the operation of PSE's Power Cost Adjustment Mechanism that determines the power cost imbalance for sharing calculation. The Exhibit A-1 included in this filing in "220066-67-Advice-2022-29-PSE-Cmpl-Exh.-A-1.xlsx", has been calculated in compliance with the underlying fixed production and variable power costs approved in the Orders.

The following items will be filed as future Subsequent filings, consistent with WAC 480-07-885: Transportation Electrification Plan Adjustment Rider (likely styled as Schedule 141TEP); Clean Energy Implementation Tracker (likely styled as Schedule 141CEI); Bill Discount Rate Schedules (likely styled as Schedules 7D1, 7D2, 7D3, 7D4, 7D5 *etc.*); and, if needed, any tariff schedule update to implement the Arrearage Management Plan. Schedule 129D may be filed as a Subsequent filing or as a future submission of a Compliance filing. Time Varying Rate/Time-of-Use Schedules originally filed as Schedules 307, 317, 324, 327, and associated Bill Discount Rate versions of those schedules may be filed as a Subsequent filing or as a future submission of a Compliance filing.

As required by WAC 480-07-880(3) a copy of this compliance filing is being served on each party to this proceeding. The filing is being served via email. The work papers, which are discussed in more detail below, are being sent separately today *via* email from "LeapFILE Secure File Transfer Service".

The enclosed revised tariff sheets reflect issue dates of December 27, 2022, and effective dates of January 5, 2023 by authority of the Washington Utilities and Transportation Commission in Dockets UE-220066 and UG-220077 (Consolidated). In compliance with WAC 480-07-880(3), PSE will be providing supporting electronic work papers to parties to the case on the

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<sup>9</sup> Exhibit A to Revenue Requirement Settlement page 9 line 8 through page 10 line 2.

<sup>10</sup> The Settlement Stipulation and Agreement (Green Direct) is included as Appendix B to the Orders ("Green Direct Settlement"). See ¶17B of the Green Direct Settlement.

Ms. Amanda Maxwell, Executive Director and Secretary

December 27, 2022

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same date this compliance filing is made. The work papers demonstrate the derivation of the rates proposed to be changed by the enclosed tariff sheets. Due to size, work papers will be provided separately *via* email as described above.

Please contact Veronica Martin at (425) 457-5624 or [veronica.martin@pse.com](mailto:veronica.martin@pse.com) or Julie Waltari at (425) 456-2945 or [julie.waltari@pse.com](mailto: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

PO Box 97034, BEL10W / Bellevue, WA 98009-9734

(425) 456-2142 / [Jon.Piliaris@pse.com](mailto:Jon.Piliaris@pse.com)

cc: Sheree Carson, Perkins Coie  
Service List

Attachments: Electric Tariff Sheets, Listed Above  
Exhibit A-1  
Certificate of Service