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

October 13, 2017

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## Filed Via Web Portal

Mr. Steven V. King, Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Re: Advice No. 2017-16- Electric Tariff Filing

Dear Mr. King,

Puget Sound Energy ("PSE") hereby submits proposed revisions to rates under its electric Schedules 51, 52, 53, 55, and 58. This filing, pursuant to RCW 80.28.060 and Chapter 480-80 WAC, proposes revisions in the following electric tariff sheets:

## WN U-60, Tariff G - (Electric Tariff):

2<sup>nd</sup> Revision of Sheet No. 51-E – LED (Light Emitting Diode) Lighting Service (Continued)

2<sup>nd</sup> Revision of Sheet No. 51-G – LED (Light Emitting Diode) Lighting Service (Continued)

3<sup>rd</sup> Revision of Sheet No. 52-C – Customer Lighting Service (Continued)

4<sup>th</sup> Revision of Sheet No. 52-E – Customer Lighting Service (Continued)

22<sup>nd</sup> Revision of Sheet No. 53 – Street Lighting Service

5<sup>th</sup> Revision of Sheet No. 53-D – Street Lighting Service (Continued)

1<sup>st</sup> Revision of Sheet No. 53-I – Street Lighting Service (Continued)

1<sup>st</sup> Revision of Sheet No. 53-J – Street Lighting Service (Continued)

4<sup>th</sup> Revision of Sheet No. 55-C – Area Lighting Service (Continued)

4<sup>th</sup> Revision of Sheet No. 58-D – Flood Lighting Service (Continued)

The primary purpose of this filing is to update tariff schedule language to clarify that PSE can deploy a Light Emitting Diode ("LED") equivalent replacement luminaire (complete electric light unit) when the currently installed luminaire is no longer available from manufacturers and suppliers, or has become obsolete. While the current overall tariff schedule language does not impede the replacement by alternative luminaires, the proposed clarifying language would make this alternative replacement clearer. With the rapid evolution of LED technology in the lighting industry, many street and area light product manufacturers are discontinuing High Pressure Sodium ("HPS") luminaires in favor of LED luminaires. While this transition was anticipated to occur over a five year period, recent actions from manufacturers has expedited the change, making it difficult for PSE to maintain installed luminaires that no longer have viable "like-for-

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like" replacement parts. The proposed updated tariff schedule language would continue to allow PSE to maintain light standards within the lighting service schedules while also helping customers transition to more energy efficient luminaires when obsolete or unavailable luminaires need to be replaced.

Additionally, the tariff schedule language for Schedules 51 and 53 has been updated to state that PSE does not provide adjusted energy rates for the use of lighting controls and advanced photocell technology, and that such equipment is considered non-standard equipment. It also clarifies the limitations of services for those customers who install such non-standard equipment. PSE will test various lighting control and advanced photocell technologies and may propose future tariff modifications if appropriate.

The tariff sheets described herein reflect an issue date of October 13, 2017, and an effective date of November 13, 2017. Posting of proposed tariff changes, as required by WAC 480-100-193, is being made by posting the proposed tariff sheet on the PSE web site immediately prior to or coincident with the date of this transmittal letter.

Please contact Malcolm McCulloch at (425) 424-6530 or Julie Waltari at (425) 456-2945 for additional information about this filing. If you have any other questions please contact me at (425) 456-2110.

Sincerely,

Ken Johnson

Director, State Regulatory Affairs Puget Sound Energy PO Box 97034, PSE-08N Bellevue, WA 98009-9734

425-456-2110

ken.s.johnson@pse.com

/s/Kenneth S. Johnson

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

Attachment:

**Electric Tariff Sheets**