BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)
PUGET SOUND ENERGY) Docket UE-23) Docket UG-23
For an Order Authorizing Deferred Accounting Treatment Of Puget Sound Energy's True-up) PETITION OF PUGET SOUND ENERGY)
Provision in Schedule 129D - Bill Discount Rate)
Rider	,

I. INTRODUCTION

- 1. In accordance with WAC 480-07-370(b), Puget Sound Energy ("PSE" or "the Company") respectfully petitions the Washington Utilities and Transportation Commission ("Commission") for an order that authorizes the accounting and ratemaking treatment detailed in this Petition related to PSE's true up provision in Schedule 129D BDR ("Bill Discount Rate") Rider. The Bill Discount Rate tariff provides for a true-up of actual amounts to the amounts set in rates for the following three rate categories.
 - a. the discount amounts provided in electric Schedule 7BDR and gas Schedule 23BDR
 - b. the administrative costs of the program; and
 - c. the amounts collected through Schedule 129D¹
- Statutes and rules at issue in this Petition include RCW 80.01.040, RCW 80.28.020, WAC 480-07-370(3), RCW 82.16.0497, RCW 80.28.068, RCW 19.405.020(25), WAC 480-90-203 and WAC 480-100-203.
- 3. PSE is a combined gas and electric utility that provides service to approximately

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¹ The amounts set in Schedule 129D are determined using the total expected bill discounts to be provided and associated administrative costs less unspent Home Energy Lifeline Program funds used to reduce the amount required to be recovered through Schedule 129D.

1,200,000 electric customers and 870,000 natural gas customers in Western Washington.

4. All correspondence related to this Petition should be directed as follows:

Puget Sound Energy

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II. SUMMARY OF PETITION

5. PSE is requesting in this Petition that the Commission approve deferred accounting treatment for its true up amounts in Schedule 129D. Once Schedule 129D is approved and rates begin, PSE requests to defer the true-up amounts as allowed under Schedule 129D as a debit/credit to a regulatory asset in FERC Account 182.3, Other Regulatory Asset or a regulatory liability in FERC Account 254, Other Regulatory Liability through an offsetting entry to FERC Account 456 (electric) or 495 (natural gas), Other Revenues.

The Company also proposes that interest will not accrue on the deferred balance² and any over/under collection will be included in PSE's annual tariff filing which includes the true-up for Schedule 129D. This accounting treatment is requested to stay in effect as long as PSE's Bill Discount Rate and Schedule 129D are in effect.

III. BACKGROUND

6. Per RCW 80.28.068, each Washington utility must propose a low-income assistance program comprised of a discount rate for low-income customers. Accordingly, in PSE's

² As the deferred balance will not accrue interest, it will be treated as investor supplied working capital.

multi-year rate plan ("MYRP") in Docket UE-220066 ("MYRP dockets"), PSE proposed its initial Bill Discount Rate program ("BDR"), which would be available to all eligible low-income customers. On December 22, 2022 the Commission issued its Final Order 24/10 in Docket UE-220066, et al ("Final Order 24/10") which approved the Revenue Requirement Settlement with conditions related to BDR. Under the Revenue Requirement Settlement, PSE agreed to consult with its Low-Income Advisory Committee ("LIAC") to develop and design a revised BDR and make a subsequent filing with the Commission by July 1, 2023 for approval of the BDR program design developed through the LIAC process. These tariff filings were filed under Dockets UE-230560 ("7BDR") and UG-230561 ("23BDR") and were approved by the Commission in the Open Meeting on August 24, 2023.

- 7. Following the tariff language included in the Schedule 7BDR and 23BDR filings, each year, funds collected under electric and gas Schedules 129 Low Income Program that were not distributed by the end of the Program year that they were designated for may be utilized for the funding of 7BDR and 23BDR. Any additional funding required for the discounts provided in 7BDR and 23BDR as well as for program costs will come from the Bill Discount Rate Rider Schedule 129D.
- 8. Also following the tariff language included in Schedule 129D, starting 2024, the Company will submit an annual tariff filing on or prior to the last day of November for rates effective on January 1 of the following year. Each annual tariff filing will set rates effective January 1 through December 31. The true-up included in such filing will apply to the amounts shown below for the prior rate period:
 - a. Actual bill discounts provided versus the amount set in rates;
 - b. Actual administrative costs versus the amount set in rates; and
 - c. Revenue set in rates versus actual revenue recovered during the prior rate period.

IV. JUSTIFICATION FOR DEFERRAL TREATMENT

9. PSE believes the granting of this Petition is needed to ensure approval to account for the true-up requested in Schedule 129D. This deferred accounting treatment will allow PSE to appropriately record the true-up amounts in the period to which they relate and recognize the receivable or payable that exists that will be included in the annual tariff filings under Schedule 129D.

V. PROPOSED ACCOUNTING TREATMENT

10. PSE proposes to defer the true-up amounts for Schedule 129D as a debit/credit to a regulatory asset in FERC Account 182.3, Other Regulatory Asset or a regulatory liability in FERC Account 254, Other Regulatory Liability through an offsetting entry to FERC Account 456 (electric) or 495 (natural gas), Other Revenues. At each quarter end, if the accumulated deferred balance is a credit, PSE will reclassify the balance to FERC Account 254, Other Regulatory Liability. Once the true-up amounts are approved in each year's tariff filing, amounts will be amortized to the same FERC accounts to which they were recorded – account 456 for electric and 495 for natural gas.

VI. REQUEST FOR RELIEF

11. For the reasons discussed above, PSE respectfully requests the Commission issue an Order approving the deferred accounting, as set forth in this Petition.

DATED this 30th day of August, 2023.

Puget Sound Energy

By /s/ Susan E. Free

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