

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PUGET SOUND ENERGY,

Petitioner,

To Approve an Exception to WAC 480-100-194(3) and Shorten the Notification Period Required for Customer Notice

DOCKET UE-250725

ORDER 02

GRANTING EXEMPTION FROM RULE

**BACKGROUND**

- 1 On September 22, 2025, Puget Sound Energy (PSE or Company) filed with the Washington Utilities and Transportation Commission (Commission) an update to its Schedules 307 (Residential Service Time-Of-Use), 317 (Residential Service Time-Of-Use with Peak Time Rebate), 324 (General Service Time-Of-Use with Peak Time Rebate), and 327 (Residential Service Time-Of-Use with Super Off-Peak). Schedules 307, 317, 324, and 327 implement the Company's two-year Time-Of-Use (TOU) pilot that was required by the Commission in PSE's 2022 general rate case (GRC).<sup>1</sup>
- 2 PSE's TOU pilot was in place from October 2023 to September 2025 and was intended to provide the Company with data to support the development of a full-scale residential TOU program in a subsequent filing. As part of its initial filing, PSE made eight recommendations related to transitioning its TOU pilot schedules in anticipation of an expanded TOU program.
- 3 On October 17, 2025, PSE filed revised tariff sheets to allow Commission staff (Staff) additional time to review the filing and correct a scrivener's error. As part of the revised tariff filing, the Company also requested that the Commission exempt the Company from the application of WAC 480-100-178(1)(e) related to billing requirements and payment dates, specifically as to the requirement to show the beginning and ending meter readings from the relevant billing period.

---

<sup>1</sup> See generally *WUTC v. Puget Sound Energy*, Dockets UE-220066, UG-220067 (*consolidated*) and UG-210918, Order 24/10 (December 22, 2022).

4 On November 19, 2025, PSE filed revised tariff sheets extending the effective date of its proposed tariff filing to December 12, 2025, and requested nine changes to related to its TOU pilot tariff pages.<sup>2</sup>

5 On November 20, 2025, this matter came before the Commission during its regularly scheduled open meeting, at which Staff and PSE agreed to:

- (1) Sunset Schedules 317 and 324 (Proposals 1 and 2);
- (2) Increase the customer caps in Schedules 307 and 327 (Proposals 3 and 4) by 2,500 customers and 1,500 customers for a total of 9000 TOU customers pending the Company's next GRC; and
- (3) Make some changes to operations procedures in how the TOU schedules are handled including clarifying that the:
  - (a) Pilot Enable Technology Provisions would expire with the end of the TOU pilot program on September 30, 2025 (Proposal 5);<sup>3</sup>
  - (b) Bill Protection would continue for certain TOU pilot customers (Proposal 6);<sup>4</sup>
  - (c) Advanced Metering Infrastructure (AMI) interval meter read threshold of 90 percent for bills would be coded as actual billing (Proposal 7); and
  - (d) Language with deployment of the billing proration would be updated to allow mid-cycle plan changes (Proposal 8).

---

<sup>2</sup> *In the Matter of the Petition of Puget Sound Energy to Approve Tariff Revisions Regarding Schedules 307, 317, 324, and 327 Related to Time-of-Use Pilot*, Docket UE-250725, Order 01 at 2 ¶ 4 (December 11, 2025).

<sup>3</sup> The Enabling Technology Provisions were designed to provide smart thermostats to approximately half of the enrolled income eligible customers in the TOU pilot.

<sup>4</sup> The TOU Bill Protection mechanism operated by comparing how much a customer would have been charged had the customer been on Residential Tariff Schedule 7, and if the total billing cycle cost with TOU rates would have been more than 10 percent higher than it would have been under Schedule 7, the customer would be credited the difference that was in excess of that 10 percent.

6 However, Staff opposed PSE’s request for a permanent exemption from the requirement in WAC 480-100-178(1)(e) to include beginning and ending meter readings on customer bills for its customers on schedules that use interval data (Proposal 9)<sup>5</sup> on the basis that customers benefit from having both beginning and ending meter data to verify actual reported usage.<sup>6</sup>

7 On December 5, 2025, PSE filed a supplement to its filing containing a second request for an exemption to WAC 480-100-194(3).

8 On December 11, 2025, this matter came back before the Commission. However, neither the Company nor Staff discussed the issue of the Company’s request for exemption from WAC 480-100-194(3). Additionally, when the Commission issued Order 01, allowing the requested tariff revisions to go into effect and authorized a temporary exemption under WAC 480-100-178(1)(e) to go into effect subject to conditions and limitations, it did not address PSE’s second request for an exemption under WAC 480-100-194(3).<sup>7</sup>

9 Unfortunately, due to the time that had elapsed between the submission of the filing on September 22, 2025, and the customer notice distribution that was completed by November 25, 2025, compliance with the “at the time of the utility’s filing with the commission” language contained in WAC 480-100-194(3)(b), WAC 480-100-194(3)(c), and WAC 480-100-194(3)(d) is no longer possible.

10 Staff has reviewed this matter and maintains that since PSE has otherwise complied with WAC 480-100-194(3) by issuing the notice via mail or electronically to individual customers, distributing copies of the notice to community agencies, sending the notice to news agencies and publishing a complete notice on its website that the Commission should issue an order granting PSE’s request.

11 On January 29, 2026, this matter came before the Commission at its regularly scheduled open meeting.

---

<sup>5</sup> WAC 480-100-178(1)(e) provides in relevant part “Customer bills must . . . [s]how the beginning and ending meter readings for the current billing period[.]”

<sup>6</sup> Docket UE-250725, Order 01 at 04 ¶ 12.

<sup>7</sup> *Id* at 5-6 ¶ 17 and 22.

## DISCUSSION

12 The Commission agrees with Staff that PSE's second request for an exemption from  
WAC 480-100-194(3) should be granted given that PSE has complied with each of the  
methods set forth under this provision consistent with the purposes of the rule and the  
public interest.<sup>8</sup>

## FINDINGS AND CONCLUSIONS

- 13 (1) The Commission is an agency of the State of Washington vested by statute with  
the authority to regulate the rates, regulations, practices, accounts, and affiliated  
interests of public service companies, including electrical companies.
- 14 (2) PSE is engaged in the business of providing electric services within the state of  
Washington and is a public service company subject to Commission jurisdiction.
- 15 (3) This matter came before the Commission at its regularly scheduled meeting on  
January 29, 2026.
- 16 (4) The Commission finds that an exemption to WAC 480-100-194(3) is not contrary  
to the underlying purposes of the rule and the public interest.

## ORDER

### THE COMMISSION ORDERS:

- 17 (1) The Commission exempts Puget Sound Energy from the application of WAC  
480-100-194(3).
- 18 (2) The Commission retains jurisdiction over the subject matter and Puget Sound  
Energy to effectuate the provisions of this Order.

---

<sup>8</sup> WAC 480-07-110(2)(c).

19 The Commissioners, having determined this Order to be consistent with the public interest, directed the Secretary to enter this Order.

DATED at Lacey, Washington, and effective January 29, 2025.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

JEFF KILLIP  
Executive Director and Secretary

**NOTICE TO PARTIES: This is a final order of the Commission. In addition to judicial review, administrative relief may be available through a petition for reconsideration filed within 10 days of the service of this order pursuant to RCW 34.05.470 and WAC 480-07-850, or a petition for rehearing pursuant to RCW 80.04.200 or RCW 81.04.200 and WAC 480-07-870.**