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Jeff Killip, Executive Director and Secretary Washington
Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**RE: Docket UG-230393 (Advice No. 2024-20)
Puget Sound Energy's Natural Gas Tariff Revision – Do Not Redocket**

Dear Executive Director Killip:

Puget Sound Energy (“PSE”) hereby submits in connection with Docket UG-230393, the following revised tariff sheets to replace the tariff sheets that accompanied its May 25, 2023, filing submitted under Advice No. 2023-23 and five new tariff sheets, in compliance with Final Order 07 (“the Order”) in Docket UG-230393 Rejecting Tariff Sheets; Authorizing and Requiring Compliance Filing.

WN U-2 - (Natural Gas Tariff):

Original	Sheet No. 1141LNG	Liquefied Natural Gas Rate Adjustment
Original	Sheet No. 1141LNG-A	Liquefied Natural Gas Rate Adjustment (Continued)
Original	Sheet No. 1141LNG-B	Liquefied Natural Gas Rate Adjustment (Continued)
Original	Sheet No. 1141LNG-C	Liquefied Natural Gas Rate Adjustment (Continued)
Original	Sheet No. 1188T	Distribution System Transportation Service (Exclusive Interruptible)
Original	Sheet No. 1188T-A	Distribution System Transportation Service (Exclusive Interruptible) (Continued)
Original	Sheet No. 1188T-B	Distribution System Transportation Service (Exclusive Interruptible) (Continued)
Original	Sheet No. 1188T-C	Distribution System Transportation Service (Exclusive Interruptible) (Continued)
Original	Sheet No. 1188T-D	Distribution System Transportation Service (Exclusive Interruptible) (Continued)
Original	Attachment “A” to Schedule 88T	Transportation Service Agreement
1 st Revision	Sheet No. 1141D	Distribution Pipeline Provisional Recovery Adjustment
1 st Revision	Sheet No. 1141D-A	Distribution Pipeline Provisional Recovery Adjustment (Continued)

1 st Revision	Sheet No. 1141D-B	Distribution Pipeline Provisional Recovery Adjustment (Continued)
2 nd Revision	Sheet No. 1141D-C	Distribution Pipeline Provisional Recovery Adjustment (Continued)
2 nd Revision	Sheet No. 1141D-D	Distribution Pipeline Provisional Recovery Adjustment (Continued)
Original	Sheet No. 1141N-D	Rates Not Subject To Refund Rate Adjustment (Continued)
Original	Sheet No. 1141N-E	Rates Not Subject to Refund Rate Adjustment (Continued)
4 th Revision	Sheet No. 37-A	Rule No. 23 Interruptible Sales and Transportation Service Priority (Continued)
2 nd Revision	Sheet No. 37-B	Rule No. 23 Interruptible Sales and Transportation Service Priority (Continued)
2 nd Revision	Sheet No. 43	Rule No. 29 Terms of Distribution System Transportation Service
3 rd Revision	Sheet No. 3-E	Natural Gas Tariff Index (Continued)
39 th Revision	Sheet No. 4	Natural Gas Tariff Index (Continued)

On May 25, 2023, PSE proposed Schedule 141LNG – Liquefied Natural Gas Rate Adjustment, which would allow PSE to recover the costs incurred with the development, construction, and operation of the Tacoma LNG Facility through a new tariff schedule, in compliance with the requirement in the Commission’s Final Order 24/10 in Dockets UE-220066, UG-220067, and UG-210918 (Consolidated).¹ The tariff filing also introduced a new tariff schedule, Schedule 88T – Distribution System Transportation Service (Exclusive Interruptible) and associated service agreement. A supplement to existing Schedule 141N and modifications to Schedules 141D, Rule 23, and Rule 29 were also necessary and part of the tariff filing, assigned Docket UG-230393. On June 8, 2023, the Commission suspended the tariff revisions and set the matter for hearing with a procedural schedule.

On April 24, 2024, the Commission issued Final Order 07 Rejecting Tariff Sheets; Authorizing and Requiring Compliance Filing in Docket UG-230393. PSE submits this compliance filing by revising the attached natural gas tariff sheets to align with the format and rates outlined in paragraphs 309 through 315, and to otherwise implement the directives of the Order. These changes include:

Schedule 141LNG:

1. Removal of PSE’s deferred return on investment between February 1, 2022 and January 11, 2023, from the Schedule 141LNG revenue requirement which was one hundred percent allocated to sales customers.
2. Removal of the preliquefaction treatment equipment from rate base and from the basis on which the deferred return and deferred depreciation are calculated.

¹ Appendix C to Final Order 24/10 – Tacoma LNG Settlement

3. Changes to Schedule 141LNG result in an overall increase of \$42.7 million or 3.09 percent, with the impact on a typical residential bill using 64 therms of \$2.99 or 3.14 percent.

Schedule 141D Monthly Rate:

4. A change to the allocation of the revenue requirement between classes to assign 70.4 percent of the cost of the four mile distribution pipeline to Schedule 88T.
5. The application of a \$2.7 million Contribution in Aid of Construction against the rate base for the four mile distribution pipeline.
6. Changes to Schedule 141D Monthly Rate result in an overall decrease of \$0.2 million or 0.02 percent, with the impact on a typical residential bill using 64 therms of (\$0.14) or (0.15) percent.

The Refund under the Schedule 141D Supplemental Rate:

7. Effective from May 11, 2024, through May 10, 2025.
8. A refund for the period January 2023 through April 2024 for the recalculation of the revenue requirement in Schedule 141D for the application of the CIAC as well as the change in the allocation of the revenues between classes is also reflected in the revenue requirement for Schedule 141D under the Supplemental Rate. This refund results in increased rates to Schedule 88T and decreased rates to sales customers for an equal and offsetting amount. The refund has also been calculated without application of the CIAC pursuant to paragraph 279 of the Order.
9. Changes to Schedule 141D Supplemental Rate has no overall impact but decreases amounts assigned to sales customers by \$2.8 million and increases amounts assigned to Schedule 88T by \$2.8 million. The impact on a typical residential bill using 64 therms of (\$0.19) or (0.20) percent.

The Conversion Factor:

10. PSE has updated the conversion factor used to gross up amounts for the revenue requirement to include the increase to the UTC filing fee to .005 percent pursuant to Section 13 of House Bill 1589. The impact of this change to the total revenue requirement in both tariff schedules is an increase of approximately \$30,000.

Overall, this compliance filing reflects a combined revenue requirement of \$42.5 million and an average increase of 3.08 percent in overall bills for all customers affected by these tariff changes. A typical residential customer using 64 therms per month would experience an increase of \$2.73 per month or 2.86 percent.

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Bill assistance programs such as PSE's Bill Discount Rate, PSE Home Energy Lifeline Program ("HELP"), the Low Income Home Energy Assistance Program ("LIHEAP"), and the Salvation Army Warm Home Fund are available to qualified customers who need help with their energy bills. PSE customers can go to <http://www.pse.com> or call 1-888-225-5773 (TTY: 1-800-962-9498) to learn if they are eligible. Payment plans are also available.

Work papers supporting the revenue requirement, rate spread, rate design, bill impacts and typical residential bill impacts are being submitted with this compliance filing. A detailed portrayal of the changes to the revenue requirement for Schedules 141LNG and 141D from the original filing have been included in the work papers. Please note that work papers submitted with this filing contain customer-specific information. PSE requests that work paper tabs marked confidential be accorded confidential treatment. Pursuant to WAC 480-07-160, they have been marked "Shaded information is designated as confidential per WAC 480-07-160."

Additionally, in response to paragraph 308 of the Order, PSE will submit the biannual reports on Notices of Violation by January 30 and July 30 each year.

Finally, PSE requests that recognition be provided in the acknowledgement letter that rates in Schedule 141D are no longer subject to the deferral treatment that was required in paragraph 449 of Final Order 24/10 in Docket No. UG-220067. PSE has made changes to the language in Schedule 141D to this effect.

The tariff sheets described herein reflect an issue date of May 3, 2024, and effective date of May 11, 2024. Posting of proposed tariff changes, as required by WAC 480-90-193, is being accomplished by posting the proposed tariff sheets on the PSE web site coincident with the date of this transmittal letter.

Please contact Susan Free at susan.free@pse.com for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

/s/ Birud D. Jhaveri

Birud D. Jhaveri
Director, Regulatory Affairs
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cc: Lisa Gafken, Public Counsel
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Service List

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Attachments:

Natural Gas Tariff Sheets (listed above)

Work Paper – Bill Impacts

Work Paper – Rate Spread Design – 141D, 141N, 88T

Work Paper – Rate Spread Design – 141LNG

Work Paper – Rate Spread Design – 141D Refunds

Work Paper – Rate Spread Design – 141D Revenue Requirement

Work Paper – Rate Spread Design – 141LNG Revenue Requirement

Work Paper – LNG Summary - Changes