



Puget Sound Energy  
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June 20, 2019

**Electronically Filed via Hand Delivery**

Mr. Mark L. Johnson, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, Washington 98504

**Re: Puget Sound Energy  
WN U-60 Tariff G, Electric Service, Advice No. 2019-25  
WN U-2 Tariff, Natural Gas Service, Advice No. 2019-26**

Dear Mr. Johnson:

**The Purpose of this Filing**

Puget Sound Energy ("PSE" or the "Company") is filing this general rate case to update its electric and natural gas rates and selected tariff schedule sheets. This filing requests an increase in rates, to recover increased electric and gas revenue requirements, of approximately \$139,527,000 (6.9%) and \$65,472,810 (7.9%), respectively, on an annual basis. The impact of the filing is described in greater detail in the Summary Documents, enclosed herewith as **Addendum E**. An overview of the topics covered by each of the Company's witnesses is provided in the Prefiled Direct Testimony of David E. Mills, Exh. DEM-1T, which is provided as part of this filing.

Please note with respect to the electric revenue requirement increase that the Company will update its projection of rate year power costs during the course of this proceeding. This update could result in an increase or decrease to the Company's initial total requested electric general rate case revenue deficiency. In addition, once this filing is suspended by the Commission and becomes an adjudicative proceeding, the evidence developed and ultimate findings and conclusions in the proceeding could produce electric and gas revenue requirements that are higher or lower than the amounts requested in this initial filing.

**Proposed Revised Tariff Sheets**

Pursuant to RCW 80.28.060, WAC 480-80-101 and WAC 480-80-105, the Company is providing an electronic copy of the proposed revised tariff sheets of PSE listed below. These tariff sheets reflect issue dates of June 20, 2019, and effective dates of July 20, 2019.

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

36 <sup>th</sup> Revision	Sheet No. 7	Residential Service
11 <sup>th</sup> Revision	Sheet No. 7-B	Master Metered Residential Service (Continued)
34 <sup>th</sup> Revision	Sheet No. 24	General Service
24 <sup>th</sup> Revision	Sheet No. 25	Small Demand General Service
16 <sup>th</sup> Revision	Sheet No. 25-A	Small Demand General Service (Continued)
25 <sup>th</sup> Revision	Sheet No. 26	Large Demand General Service
Original Sheet	Sheet No. 26-B	Large Demand General Service (Continued) [Conj. Demand]
30 <sup>th</sup> Revision	Sheet No. 29	Seasonal Irrigation & Drainage Pumping Service
36 <sup>th</sup> Revision	Sheet No. 31	Primary General Service
Original Sheet	Sheet No. 31-B	Primary General Service (Continued) [Conj. Demand]
29 <sup>th</sup> Revision	Sheet No. 35	Seasonal Primary Irrigation & Drainage Pumping Service
11 <sup>th</sup> Revision	Sheet No. 40	Large General Service Greater Than 3 aMW
27 <sup>th</sup> Revision	Sheet No. 43-A	Interruptible Primary Service for Total-Electric Schools (Continued)
35 <sup>th</sup> Revision	Sheet No. 46	High Voltage Interruptible Service
16 <sup>th</sup> Revision	Sheet No. 46-A	High Voltage Interruptible Service (Continued)
34 <sup>th</sup> Revision	Sheet No. 49	High Voltage General Service
34 <sup>th</sup> Revision	Sheet No. 50	Limited Street Lighting Service
5 <sup>th</sup> Revision	Sheet No. 51-B	LED (Light Emitting Diode) Lighting Service (Continued)
5 <sup>th</sup> Revision	Sheet No. 51-C	LED (Light Emitting Diode) Lighting Service (Continued)
6 <sup>th</sup> Revision	Sheet No. 51-D	LED (Light Emitting Diode) Lighting Service (Continued)
25 <sup>th</sup> Revision	Sheet No. 52-A	Custom Lighting Service Company Owned (Continued)
11 <sup>th</sup> Revision	Sheet No. 52-B	Custom Lighting Service Company Owned (Continued)
23 <sup>rd</sup> Revision	Sheet No. 53-A	Street Lighting Service Sodium Vapor (Continued)
20 <sup>th</sup> Revision	Sheet No. 53-B	Street Lighting Service Sodium Vapor (Continued)
14 <sup>th</sup> Revision	Sheet No. 53-C	Street Lighting Service Sodium Vapor (Continued)
8 <sup>th</sup> Revision	Sheet No. 53-F	Street Lighting Service Sodium Vapor (Continued)
5 <sup>th</sup> Revision	Sheet No. 53-G	Street Lighting Service Sodium Vapor (Continued)
4 <sup>th</sup> Revision	Sheet No. 53-H	Street Lighting Service Sodium Vapor (Continued)
36 <sup>th</sup> Revision	Sheet No. 54	Customer-Owned Street Lighting Energy Service Sodium Vapor
11 <sup>th</sup> Revision	Sheet No. 54-A	Customer-Owned Street Lighting Energy Service Sodium Vapor (Continued)

7 <sup>th</sup> Revision	Sheet No. 54-B	Customer-Owned Street Lighting Energy Service Sodium Vapor (Continued)
37 <sup>th</sup> Revision	Sheet No. 55	Area Lighting Service
18 <sup>th</sup> Revision	Sheet No. 55-A	Area Lighting Service (Continued)
33 <sup>rd</sup> Revision	Sheet No. 57	Continuous Lighting Service
32 <sup>nd</sup> Revision	Sheet No. 58	Flood Lighting Service
21 <sup>st</sup> Revision	Sheet No. 58-A	Flood Lighting Service (Continued)
7 <sup>th</sup> Revision	Sheet No. 58-B	Flood Lighting Service (Continued)
7 <sup>th</sup> Revision	Sheet No. 58-C	Flood Lighting Service (Continued)
4 <sup>th</sup> Revision	Sheet No. 139-E	Voluntary Long Term Renewable Energy Purchase Rider (Continued)
5 <sup>th</sup> Revision	Sheet No. 141-A	Expedited Rate Filing Rate Adjustment (Continued)
5 <sup>th</sup> Revision	Sheet No. 141-B	Expedited Rate Filing Rate Adjustment (Continued)
4 <sup>th</sup> Revision	Sheet No. 141-C	Expedited Rate Filing Rate Adjustment (Continued)
4 <sup>th</sup> Revision	Sheet No. 141-D	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-E	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-F	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-G	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-H	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-I	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-J	Expedited Rate Filing Rate Adjustment (Continued)
4 <sup>th</sup> Revision	Sheet No. 141-K	Expedited Rate Filing Rate Adjustment (Continued)
4 <sup>th</sup> Revision	Sheet No. 141-L	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-M	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 141-N	Expedited Rate Filing Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment
1 <sup>st</sup> Revision	Sheet No. 141X-A	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-B	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-C	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-D	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-E	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-F	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-G	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)

1 <sup>st</sup> Revision	Sheet No. 141X-H	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-I	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-J	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals (Continued)
1 <sup>st</sup> Revision	Sheet No. 141X-K	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals (Continued)
10 <sup>th</sup> Revision	Sheet No. 142	Revenue Decoupling Adjustment Mechanism
10 <sup>th</sup> Revision	Sheet No. 142-A	Revenue Decoupling Adjustment Mechanism (Continued)
7 <sup>th</sup> Revision	Sheet No. 142-B	Revenue Decoupling Adjustment Mechanism (Continued)
7 <sup>th</sup> Revision	Sheet No. 142-C	Revenue Decoupling Adjustment Mechanism (Continued)
10 <sup>th</sup> Revision	Sheet No. 142-D	Revenue Decoupling Adjustment Mechanism (Continued)
6 <sup>th</sup> Revision	Sheet No. 142-F	Revenue Decoupling Adjustment Mechanism (Continued)
14 <sup>th</sup> Revision	Sheet No. 448-I	Power Supplier Choice (Continued)
15 <sup>th</sup> Revision	Sheet No. 449-I	Retail Wheeling Service (Continued)

An electronic copy of **Addendum A**, which contains the above electric tariff sheets formatted with the coding required by WAC 480-80-105, are enclosed. An electronic copy of **Addendum B**, which contains the above electric tariff sheets in legislative format as required by WAC 480-07-510(2), are also enclosed.

**WN U-2 Tariff, Natural Gas Service:**

14 <sup>th</sup> Revision	Sheet No. 116-A	General Gas Lighting and Street Lighting Service (Optional) (Continued)
59 <sup>th</sup> Revision	Sheet No. 123	Residential General Service
55 <sup>th</sup> Revision	Sheet No. 131	Commercial and Industrial General Service
9 <sup>th</sup> Revision	Sheet No. 131T	Distribution System Transportation Service (Firm-Commercial and Industrial)
61 <sup>st</sup> Revision	Sheet No. 141	Large Volume High Load Factor Gas Service (Optional)
22 <sup>nd</sup> Revision	Sheet No. 141-A	Large Volume High Load Factor Gas Service (Optional) (Continued)
9 <sup>th</sup> Revision	Sheet No. 141T	Distribution System Transportation Service (Firm-Large Volume High Load Factor)
9 <sup>th</sup> Revision	Sheet No. 141T-A	Distribution System Transportation Service (Firm-Large Volume High Load Factor) (Continued)
15 <sup>th</sup> Revision	Sheet No. 153-B	Propane Service (Continued)
27 <sup>th</sup> Revision	Sheet No. 171	Residential Water Heater Rental Service
28 <sup>th</sup> Revision	Sheet No. 172	Large Volume Water Heater Rental Service
22 <sup>nd</sup> Revision	Sheet No. 174	Gas Conversion Burner Rental Service

22 <sup>nd</sup> Revision	Sheet No. 185-C	Interruptible Gas Service with Firm Option (Continued)
21 <sup>st</sup> Revision	Sheet No. 185-D	Interruptible Gas Service with Firm Option (Continued)
9 <sup>th</sup> Revision	Sheet No. 185T	Distribution System Transportation Service (Interruptible with Firm Option)
6 <sup>th</sup> Revision	Sheet No. 185T-A	Distribution System Transportation Service (Interruptible with Firm Option) (Continued)
22 <sup>nd</sup> Revision	Sheet No. 186-C	Limited Interruptible Gas Service with Firm Option (Optional) (Continued)
18 <sup>th</sup> Revision	Sheet No. 186-D	Limited Interruptible Gas Service with Firm Option (Optional) (Continued)
7 <sup>th</sup> Revision	Sheet No. 186T	Distribution System Transportation Service (Interruptible with Firm Option)
8 <sup>th</sup> Revision	Sheet No. 186T-A	Distribution System Transportation Service (Interruptible with Firm Option) (Continued)
23 <sup>rd</sup> Revision	Sheet No. 187-D	Non-Exclusive Interruptible Gas Service w/ Firm Option (Continued)
7 <sup>th</sup> Revision	Sheet No. 187T	Distribution System Transportation Service (Non-Exclusive Interruptible with Firm Option)
8 <sup>th</sup> Revision	Sheet No. 187T-A	Distribution System Transportation Service (Non-Exclusive Interruptible with Firm Option) (Continued)
5 <sup>th</sup> Revision	Sheet No. 1141-A	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 1141-B	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 1141-C	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 1141-D	Expedited Rate Filing Rate Adjustment (Continued)
3 <sup>rd</sup> Revision	Sheet No. 1141-E	Expedited Rate Filing Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 1141X	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment
1 <sup>st</sup> Revision	Sheet No. 1141X-A	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 1141X-B	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 1141X-C	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 <sup>st</sup> Revision	Sheet No. 1141X-D	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
6 <sup>th</sup> Revision	Sheet No. 1142-A	Revenue Decoupling Adjustment Mechanism (Continued)
6 <sup>th</sup> Revision	Sheet No. 1142-B	Revenue Decoupling Adjustment Mechanism (Continued)
9 <sup>th</sup> Revision	Sheet No. 1142-C	Revenue Decoupling Adjustment Mechanism (Continued)

An electronic copy of **Addendum C**, which contains the above natural gas tariff sheets formatted with the coding required by WAC 480-80-105, are enclosed. An electronic copy of

**Addendum D**, which contains the above natural gas tariff sheets in legislative format as required by WAC 480-07-510(2), are also enclosed.

Additionally, as explained in the Prefiled Direct Testimony of Jon A. Piliaris, Exh. JAP-1T, and in the Prefiled Direct Testimony of John D. Taylor, Exh. JDT-1T, several electric and natural gas rider schedules will need to be reset simultaneously with the proposed changes to base rates in this general rate case. While not filed as part of this case, the following tariff sheets will be included in the final compliance filing with the effective date of new base rates resulting from this rate case.

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

Sheet No. 95	Power Cost Adjustment Clause
Sheet No. 95-A	Power Cost Adjustment Clause (Continued)
Sheet No. 95-B	Power Cost Adjustment Clause (Continued)
Sheet No. 95-C	Power Cost Adjustment Clause (Continued)
Sheet No. 95-C.1	Power Cost Adjustment Clause (Continued)
Sheet No. 95-C.2	Power Cost Adjustment Clause (Continued)
Sheet No. 95-D	Power Cost Adjustment Clause (Continued)
Sheet No. 95-E	Power Cost Adjustment Clause (Continued)
Sheet No. 95-E.1	Power Cost Adjustment Clause (Continued)

**WN U-2 Tariff, Natural Gas Service:**

Sheet No. 1149	Cost Recovery Mechanism for Pipeline Replacement (CRM)
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**Additional Materials Submitted With This Filing**

PSE is filing prefiled direct testimony and exhibits supporting this general rate case. For the convenience of the Commission and persons interested in this case, a list of these testimonies and the exhibits supported by each witness is provided as **Addendum F**. In compliance with WAC 480-07-510, the Company will provide five copies of the Company's prefiled direct testimony and exhibits supporting this general rate case filing. As reflected in the Commission's June 13, 2019 Open Meeting Minutes, the Company will provide these hard copies on or before June 28, 2019. These materials will be offered into the record at the appropriate time and should not be considered evidence until so entered.

In compliance with WAC 480-07-510(3)(g), the Report of Affiliated Interest Transactions for the test year is provided in the Fourth Exhibit to the Prefiled Direct Testimony of Stephen J. King, Exh. SJK-5.

## **Work Papers**

In compliance with WAC 480-07-510(4)(a), PSE will be providing supporting electronic work papers to Commission Staff and Public Counsel by June 27, 2019.

## **Confidentiality Protections and Motion for Highly Confidential Protective Order**

As is evident from PSE's filing, the Company has marked certain pages "**Shaded Information is Designated as Confidential per WAC 480-07-160**" and certain pages "**Shaded Information is Designated as Highly Confidential per WAC 480-07-160.**" These documents are currently protected from any further disclosure by the Commission or the Office of the Attorney General, including their outside experts, pursuant to **RCW 80.04.095** and **WAC 480-07-160**. PSE's filing includes a motion requesting that the Commission issue a protective order with highly confidential provisions.

The Company therefore requests that the documents that will be provided in the envelopes identified with the cover page marked "**Shaded Information is Designated as Confidential per WAC 480-07-160**" or "**Shaded Information is Designated as Highly Confidential per WAC 480-07-160,**" as well as the files marked "confidential" or "highly confidential" be treated as confidential under the provisions of WAC 480-07-160, as they each contain sensitive commercial information. .

Electronic media (*e.g.* flash drive) containing confidential materials have also been appropriately identified. PSE is providing a "Public" flash drive containing a complete public set of the filing, including redacted versions of confidential and highly confidential files and nonconfidential files. PSE is providing a "Confidential" flash drive containing the "Confidential" files, and a "Highly Confidential" flash drive containing the "Highly Confidential" files. The file names for each document identifies whether the document is "confidential" or "highly confidential."

The Company, its customers, and/or the project owners and developers that submitted commercially sensitive information to PSE would be harmed by release of the confidential or highly confidential information contained in PSE's filing. As detailed in PSE's motion for protective order submitted with this filing, this information includes portfolio management strategies, projections of future capital spending, commercial information, modeling, and sensitive competitive information. Some of this information relates to the Company's resource acquisition process that should not be viewed at all by persons involved in engineering, procurement or construction of energy projects or resources. PSE has designated such material as "highly confidential" because it reflects confidential information that PSE received from respondents to PSE's request for qualifications for engineering, procurement and construction

services. Such information is commercially sensitive also because it reveals information about PSE's analyses or strategies with respect to PSE's negotiations with such respondents. To the extent any such persons or entities seek to intervene in this matter, they should not thereby be permitted access to "highly confidential" information.

### **Notice of General Rate Case Filing**

Pursuant to WAC 480-07-510(5), the Company is serving copies of the Summary Documents in **Addendum E** on the persons listed on the Certificate of Service attached to this letter. A copy of the form of the cover letter and certificate of service for the parties noticed pursuant to WAC 480-07-510(5) are also provided in **Addendum G**.

Pursuant to WAC 480-100-194 and 480-90-194, PSE agrees to suspension of the proposed tariff filings and thus is not required to publish notice coincident with the date of this transmittal letter and filing. The Company agrees to waive suspension hearing and requests that the Commission issue an order suspending these proposed changes for investigation and that a hearing to take testimony from the public will be scheduled at the prehearing conference. Accordingly, the Company will provide notice to the public pursuant to WAC 480-100-197 and 480-90-197. In accordance with WAC 480-100-193(1) and 480-90-193(1), the Company will also post the proposed changes to its tariff sheets for public inspection and review on its website and will provide access via request by telephone or mail.

Service and correspondence relating to this filing should be directed to:

Jon Piliaris  
Director, Regulatory Affairs  
Puget Sound Energy  
P.O. Box 97034 EST-07W  
Bellevue, WA 98009-9734  
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Sheree Strom Carson, WSBA #25349  
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Attorneys for Puget Sound Energy



Mr. Mark L. Johnson, Executive Director and Secretary

June 20, 2019

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We look forward to working with the Commission, Commission Staff, Public Counsel, our customers, and other interested parties on this important matter.

Sincerely,

*/s/ Jon Piliaris*

Jon Piliaris  
Director, Regulatory Affairs  
Puget Sound Energy  
P.O. Box 97034 EST-07W  
Bellevue, WA 98009-9734  
(425) 456-2142  
[jon.piliaris@pse.com](mailto:jon.piliaris@pse.com)

cc: Sheree Strom Carson, Perkins Coie  
Service List

Attachments:

Addendum A – Electric Tariff Sheets  
Addendum B – Electric Tariff Sheets – Legislative Format  
Addendum C – Gas Tariff Sheets  
Addendum D – Gas Tariff Sheets – Legislative Format  
Addendum E – Summary Documents (Electric and Gas)  
Addendum F – Exhibit List  
Addendum G – Form of Summary Document Cover Letter