



Puget Sound Energy
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May 28, 2021

Filed Via Web Portal

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**Re: Advice No. 2021-15
PSE Electric Tariff Revision - Filed Electronically**

Dear Mr. Johnson:

Puget Sound Energy (“PSE”) hereby submits proposed revisions to its electric Schedule 129, Low Income Program. This filing, pursuant to RCW 80.28.060 and Chapter 480-80 WAC, proposes revisions to the following electric tariff sheets.

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

18th Revision of Sheet No. 129 Schedule 129 Low Income Program

16th Revision of Sheet No. 129-A Schedule 129 Low Income Program (Continued)

The primary purpose of this filing is to revise PSE’s Schedule 129 Low Income Program to comply with the definition of “low-income” as established by the Washington Utilities and Transportation Commission (“the Commission”) in Docket UE-200629.

Section 12 of the Clean Energy Transformation Act (“CETA”), codified as RCW 19.405.120, includes provisions regarding energy assistance, or utility programs undertaken to reduce customer energy bills. One of the energy assistance provisions in RCW 19.405.120(2) requires electric utilities to “make programs and funding available for energy assistance to low-income households by July 31, 2021.”

RCW 19.405.020(25) directs the Commission and the Washington Department of Commerce to establish the definition of “low-income.” The Commission established the following low-income definition in its rules implementing CETA: “Low-income” means household incomes that do not

exceed the higher of eighty percent of area median income or two hundred percent of federal poverty level, adjusted for household size.¹

On April 21, 2021, the Commission issued its *Notice of Programs and Funding Requirements for Electric Utilities Under CETA* (“*Notice*”), which interprets its low-income guidelines as requiring utilities to provide at least one program that provides “ready access” to all low-income programs, and to do so, the Commission finds that utilities must either update their bill assistance income eligibility to comply with the statute at this time or file new monetary assistance programs that are available to all low-income customers.

As part of Schedule 129, PSE currently offers two bill payment assistance programs, 1) the PSE Home Energy Lifeline Program (HELP), and 2) the Crisis-Affected Customer Assistance Program (CACAP). Because the CACAP structure was based on a separate set of guidelines in Order 01 in Docket U-200281, PSE determined that it would not be feasible to utilize that program and is opting to modify the Income Eligibility Criteria of HELP. Based on the low-income definition currently set by the Commission, PSE is updating the Income Eligibility Criteria in Schedule 129 to adjust the definition of “very low-income households” as being households with an income not to exceed the higher of 80% of area median income or 200% of federal poverty level adjusted for household size.

PSE is making this tariff filing before July 31st and tariff schedule sheets with an effective date before July 31st; but the provisions of the changes and the benefit calculations would not take effect until October 1, 2021 to better align with the start of the program year for HELP. Based on direction from the Commission Regulatory Policy Staff and their interpretation of the Commission’s April 21st *Notice of Programs and Funding Requirements for Electric Utilities Under CETA*, this timing should be acceptable to the Commission and this filing makes PSE fully compliant with the ‘Income Eligibility’ section in that Notice.

As already noted in the Commission’s April 21st *Notice*, PSE already currently offers at least two energy assistance programs for households at or below the low-income definition; therefore, PSE is not required to create a new low-income energy assistance program.

Additionally, this filing removes outdated language from the Income Eligibility Criteria section of the tariff which references income eligibility requirements which were no longer in effect as of October 1, 2018 and updates the reference to the definition of “very low-income households” to the current definition in LIHEAP Statute Section 2605(b)(2)(B)(i).

The tariff sheets described herein reflect an issue date of May 28, 2021, and an effective date of June 27, 2021. Posting of the proposed tariff change for public inspection and review, as required by law and the Commission’s rules and regulations, is being completed in accordance with WAC 480-100-193(1).

¹ See WAC 480-109-060(22)

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Please contact Veronica Martin at (425) 457-5624 for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

/s/ Jon A. Piliaris

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

Attachments:
Electric Tariff Sheets (listed above)