



PUGET SOUND ENERGY

The Energy To Do Great Things

Puget Sound Energy, Inc.

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Bellevue, WA 98009-9734

May 20, 2009

Mr. David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

RE: Docket No. UG-090706 (Advice No. 2009-13)
Substitute Tariff Sheet and Substitute Cover Letter – **Do Not Redocket** - Filed Electronically
Request for Exemption From WAC 480-80-111(1)(b)

Dear Mr. Danner:

Puget Sound Energy, Inc. (the "Company" or "PSE") hereby submits, in connection with Docket No. UG-090706, the following substitute tariff sheet to replace the tariff sheet filed on May 8, 2009 under the Company's Advice No. 2009-13. Also enclosed is a revised Less than Statutory Notice ("LSN") form as the Company discovered that the LSN form originally submitted contained some text from a prior filing. This substitute filing is pursuant to RCW 80.28.060 and Chapter 480-80 WAC and includes the following portion of the Company's tariff for natural gas service:

WN U-2 - (Natural Gas Tariff):

First Revision of Sheet No. 1106-A - Supplemental Schedule No. 106 (Continued) Deferred Account Adjustment

The purpose of these substitutions is to incorporate changes to the original May 8 filing following consultation with Commission Staff to extend the credit over a twelve month period rather than a four month period as originally proposed by the Company. Revised work papers were submitted to Commission Staff prior to this filing.

The enclosed substitute tariff sheet reflects an issue date of May 8, 2009 and an effective date of June 8, 2009. This substitute tariff sheet reflects a smaller credit than the credit proposed in the original tariff filed on May 8, 2009 and thus has the effect of increasing the rates in comparison to the original filing. However, when compared to rates currently in effect this substitute tariff sheet reflects a decrease in rates. This substitute tariff sheet does not make any changes to terms and conditions of the pending tariff sheet.

Pursuant to WAC 480-80-015, the Company respectfully requests that this substitute filing be granted an exemption from WAC 480-80-111(1)(b), which requires that a when a company submits a substitute tariff filing that "(b) [t]he change does not increase the rates contained in the pending tariff sheet". As noted above, this substitute filing does reflect a smaller credit than the original tariff sheet, but the original and substitute rates

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are both credit rates. The amount of credit per therm is being reduced but the credit to be received by customers in total is the same amount, only it will be received over a twelve month period rather than a four month period. In the initial filing, the Company requested that this filing be approved with LSN and now requests that the order allowing LSN include exemption from WAC 480-80-111(1)(b) for this Docket.

Please contact Janet Phelps at (425) 456-2304 for additional information about this filing or contact Lynn Logen at (425) 462-3872 about procedural issues of this filing. If you have any other questions please contact me at (425) 462-3495.

Very truly yours,



Tom DeBoer
Director, Federal & State Regulatory Affairs

Enclosure

cc: Simon J. ffitch, Public Counsel
Sheree Strom Carson, Perkins Coie
Paula Pyron, NWIGU