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August 31, 2022

Filed Via Web Portal

Ms. Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**Re: Advice No. 2022-16
PSE's Electric Tariff Revision - Filed Electronically**

Dear Ms. Maxwell:

Pursuant to RCW 80.28.060 and WAC 480-80-101 and WAC 480-80-105(1)(c), please find enclosed for filing the following proposed revisions to the WN U-60, Tariff for electric service of Puget Sound Energy ("PSE"):

18th Revision of Sheet No. 129-B	Low Income Program (Continued)
18th Revision of Sheet No. 129-C	Low Income Program (Continued)
20th Revision of Sheet No. 129-D	Low Income Program (Continued)
18th Revision of Sheet No. 129-E	Low Income Program (Continued)
17th Revision of Sheet No. 129-F	Low Income Program (Continued)
18th Revision of Sheet No. 129-G	Low Income Program (Continued)
9th Revision of Sheet No. 129-H	Low Income Program (Continued)
7th Revision of Sheet No. 129-I	Low Income Program (Continued)

The purpose of this filing is to convey PSE's annual low income compliance filing¹. This filing proposes an increase in the total electric low income program electric revenue requirement of

¹ As provided for in,

- 1) Exhibit G to the Settlement Stipulation Agreement approved by the Commission in Dockets UE-011570 and UG-011571 (the "Settlement"), and as ordered
- 2) by the Commission in Order 08 in Dockets UE-060266 and UG-060267 (Consolidated), and
- 3) the Multiparty Settlement Stipulation in Docket U-072375 and the Partial Settlement in Dockets UE-072300 and UG-072301, and
- 4) the Supplemental HELP funding adjustment described in PSE's initial brief in Dockets UE-090704 and UG-090705 (Consolidated), and as ordered by
- 5) the Commission in Order 08 in Dockets UE-111048 and UG-111049 ("Order 08"), and
- 6) the Commission in Order 07 in Dockets UE-121697 and UG-121705 (Consolidated) issued jointly with Order 07 in Dockets UE-130137 and UG-130138 (Consolidated) ("Order 07"), and as ordered by
- 7) the Commission in Dockets UE-170033 and UG-170034 (Consolidated), and as ordered by
- 8) the Commission in Order 08 in Dockets UE-190529 and UG-190530 (Consolidated)("Order 08").

\$25,950,469. The change in revenue requirement results in an average overall increase to rates for electric customers of 1.14 percent. The typical Schedule 7 residential customer using 800 kWh per month would experience an increase of \$1.06 per month or 1.22 percent. The revised level of funding, revenue requirement and prior year collections are detailed in work papers provided with this filing. The benefits under Schedule 129 are available to PSE customers meeting the criteria described within that Schedule and pay for any charges on their electric bills.

Included in the electric revenue requirement is the recovery of the COVID-19 bill assistance program established in Docket U-200281 and deferred under the accounting petition approved in Docket UE-200780.² As required, PSE provided temporary assistance for residential customers earning up to 200 percent of the Federal Poverty Level with annual maximum award amount of \$2,500 per household. This program was funded at a level of one percent of PSE's revenues, leading to distributions of up to \$25.6 million over the program term to 33,258 households³, which has now been fully disbursed.

While Docket U-200281 did not designate whether these funds be provided to electric or gas customers, PSE initially assisted both types of customers based on the required criteria. However, on November 12, 2021, as part of Dockets UE-210792 and UG-210793 the Commission approved PSE's revision to electric and natural gas Schedules 129, to implement a Supplemental Crisis Affected Customer Assistance Program ("CACAP") to assist low-income customers with arrearages. The Supplemental CACAP program is mainly funded through unspent prior year electric and natural gas Schedules 129 Home Energy Lifeline Program ("HELP") funds, but a portion of the electric funds also came from the COVID-19 bill assistance program approved in UE-200780. This filing also allowed natural gas COVID-19 bill assistance disbursements amounts to be fully funded through unspent natural gas HELP funds.

Therefore, only electric COVID-19 bill assistance funds remain to be collected and PSE is seeking recovery of the outstanding amounts over one year in the electric revenue requirement in this tariff filing. While including the recovery of the COVID-19 bill assistance program does lead to an increase in Schedule 129 rates, it has no impact on the HELP program caps or availability of the annual HELP funds as compared to if the COVID-19 bill assistance recovery were not included in this filing.

Additionally, a condition of the deferral and recovery of these costs as ordered in Order 01 of Docket UE-200780 was that PSE shall track "its normalized earnings during the deferral period, and should report those earnings at such time as the Company seeks to recover its deferred costs."⁴ Accordingly, PSE has included work papers in this filing detailing its normalized earnings during the deferral period which shows PSE under-earning during all periods and thus has met that stated threshold for recovery.

² Direct costs, direct benefits, foregone fee revenues and bad debt expense that were approved for deferral in Docket UE-200870 are not being sought for recovery in this filing.

³ 33,258 households as of 8/1/2022

⁴ Order 01 Dockets UE-200780 and UG-200781 ¶30

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The tariff sheets described herein reflect an issue date of August 31, 2022, and effective date of October 1, 2022. Posting of proposed tariff changes, as required by law and the Commission's rules and regulations, is being completed through web, telephone and mail access in accordance with WAC 480-100-193. Notice to the public under the provisions of WAC 480-100-194 will be provided within 30 days of the October 1, 2022, effective date.

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

Sincerely,

/s/ Jon A. Piliaris

Jon A. Piliaris - Director, Regulatory Affairs

Puget Sound Energy

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

Attachments:

Electric Tariff Sheets (listed above)

Work Papers

COVID-19 Earnings Test