

Puget Sound Energy P.O. Box 97034 Bellevue, WA 98009-9734 PSE.com

September 23, 2020

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: Docket UE-190529 (Advice No. 2020-29) – <u>Do Not Redocket</u> PSE's Electric Tariff Revision - Filed Electronically

Dear Mr. Johnson:

Pursuant to RCW 80.28.060, WAC 480-80-101 and -105, and WAC 480-07-880, enclosed are copies of the following revised tariff sheets:

WN U-60, Tariff G, Electric Service:

L .	t	1
36 th Revision	Sheet No. 7	Residential Service
11 th Revision	Sheet No. 7-B	Master Metered Residential Service (Continued)
34 th Revision	Sheet No. 24	General Service
24 th Revision	Sheet No. 25	Small Demand General Service
16 th Revision	Sheet No. 25-A	Small Demand General Service (Continued)
25 th Revision	Sheet No. 26	Large Demand General Service
Original Sheet	Sheet No. 26-B	Large Demand General Service (Continued) [Conj.
		Demand]
30 th Revision	Sheet No. 29	Seasonal Irrigation & Drainage Pumping Service
36 th Revision	Sheet No. 31	Primary General Service
Original Sheet	Sheet No. 31-B	Primary General Service (Continued) [Conj. Demand]
29 th Revision	Sheet No. 35	Seasonal Primary Irrigation & Drainage Pumping Service
11 th Revision	Sheet No. 40	Large General Service Greater Than 3 aMW
27 th Revision	Sheet No. 43-A	Interruptible Primary Service for Total-Electric Schools
		(Continued)
35 th Revision	Sheet No. 46	High Voltage Interruptible Service
16 th Revision	Sheet No. 46-A	High Voltage Interruptible Service (Continued)
34 th Revision	Sheet No. 49	High Voltage General Service
34 th Revision	Sheet No. 50	Limited Street Lighting Service
5 th Revision	Sheet No. 51-B	LED (Light Emitting Diode) Lighting Service (Continued)
5 th Revision	Sheet No. 51-C	LED (Light Emitting Diode) Lighting Service (Continued)

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6 th Revision	Sheet No. 51-D	LED (Light Emitting Diode) Lighting Service (Continued)
25 th Revision	Sheet No. 52-A	Custom Lighting Service Company Owned (Continued)
11 th Revision	Sheet No. 52-B	Custom Lighting Service Company Owned (Continued)
23 rd Revision	Sheet No. 53-A	Street Lighting Service Sodium Vapor (Continued)
20 th Revision	Sheet No. 53-B	Street Lighting Service Sodium Vapor (Continued)
14 th Revision	Sheet No. 53-C	Street Lighting Service Sodium Vapor (Continued)
8 th Revision	Sheet No. 53-F	Street Lighting Service Sodium Vapor (Continued)
5 th Revision	Sheet No. 53-G	Street Lighting Service Sodium Vapor (Continued)
4 th Revision	Sheet No. 53-H	Street Lighting Service Sodium Vapor (Continued)
36 th Revision	Sheet No. 54	Customer-Owned Street Lighting Energy Service Sodium
		Vapor
11 th Revision	Sheet No. 54-A	Customer-Owned Street Lighting Energy Service Sodium
		Vapor (Continued)
7 th Revision	Sheet No. 54-B	Customer-Owned Street Lighting Energy Service Sodium
		Vapor (Continued)
37 th Revision	Sheet No. 55	Area Lighting Service
18 th Revision	Sheet No. 55-A	Area Lighting Service (Continued)
33 rd Revision	Sheet No. 57	Continuous Lighting Service
32 nd Revision	Sheet No. 58	Flood Lighting Service
21 st Revision	Sheet No. 58-A	Flood Lighting Service (Continued)
7 th Revision	Sheet No. 58-B	Flood Lighting Service (Continued)
7 th Revision	Sheet No. 58-C	Flood Lighting Service (Continued)
39 th Revision	Sheet No. 95	Power Cost Adjustment Clause
14 th Revision	Sheet No. 95-A	Power Cost Adjustment Clause (Continued)
16 th Revision	Sheet No. 95-B	Power Cost Adjustment Clause (Continued)
15 th Revision	Sheet No. 95-C	Power Cost Adjustment Clause (Continued)
8 th Revision	Sheet No. 95-C.1	Power Cost Adjustment Clause (Continued)
8 th Revision	Sheet No. 95-C.2	Power Cost Adjustment Clause (Continued)
15 th Revision	Sheet No. 95-D	Power Cost Adjustment Clause (Continued)
15 th Revision	Sheet No. 95-E	Power Cost Adjustment Clause (Continued)
6 th Revision	Sheet No. 95-E.1	Power Cost Adjustment Clause (Continued)
4 th Revision	Sheet No. 139-E	Voluntary Long Term Renewable Energy Purchase Rider
		(Continued)
5 th Revision	Sheet No. 141-A	Expedited Rate Filing Rate Adjustment (Continued)
5 th Revision	Sheet No. 141-B	Expedited Rate Filing Rate Adjustment (Continued)
4 th Revision	Sheet No. 141-C	Expedited Rate Filing Rate Adjustment (Continued)
4 th Revision	Sheet No. 141-D	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 141-E	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 141-F	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 141-G	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 141-H	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 141-I	Expedited Rate Filing Rate Adjustment (Continued)

3 rd Revision	Shoot No. 141 I	Expedited Data Filing Data Adjustment (Continued)
	Sheet No. 141-J Sheet No. 141-K	Expedited Rate Filing Rate Adjustment (Continued)
4 th Revision		Expedited Rate Filing Rate Adjustment (Continued)
4 th Revision	Sheet No. 141-L	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 141-M	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 141-N	Expedited Rate Filing Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment
1 st Revision	Sheet No. 141X-A	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-B	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-C	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-D	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-E	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-F	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-G	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-H	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 141X-I	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals (Continued)
1 st Revision	Sheet No. 141X-J	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals (Continued)
1 st Revision	Sheet No. 141X-K	Protected-Plus Excess Deferred Income Tax (EDIT)
		Reversals (Continued)
Original	Sheet No. 141Z	Unprotected Excess Deferred Income Tax (UP EDIT)
0		Reversals Rate Adjustment
Original	Sheet No. 141Z-A	Unprotected Excess Deferred Income Tax (UP EDIT)
6		Reversals Rate Adjustment (Continued)
Original	Sheet No. 141Z-B	Unprotected Excess Deferred Income Tax (UP EDIT)
8		Reversals Rate Adjustment (Continued)
Original	Sheet No. 141Z-C	Unprotected Excess Deferred Income Tax (UP EDIT)
8		Reversals Rate Adjustment (Continued)
Original	Sheet No. 141Z-D	Unprotected Excess Deferred Income Tax (UP EDIT)
		Reversals Rate Adjustment (Continued)
Original	Sheet No. 141Z-E	Unprotected Excess Deferred Income Tax (UP EDIT)
Siiginai		Reversals Rate Adjustment (Continued)
Original	Sheet No. 141Z-F	Unprotected Excess Deferred Income Tax (UP EDIT)
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Sheet No. 141Z-G	Unprotected Excess Deferred Income Tax (UP EDIT)
	Reversals Rate Adjustment (Continued)
Sheet No. 141Z-H	Unprotected Excess Deferred Income Tax (UP EDIT)
	Reversals Rate Adjustment (Continued)
Sheet No. 141Z-I	Unprotected Excess Deferred Income Tax (UP EDIT)
	Reversals Rate Adjustment (Continued)
Sheet No. 141Z-J	Unprotected Excess Deferred Income Tax (UP EDIT)
	Reversals Rate Adjustment (Continued)
Sheet No. 141Z-K	Unprotected Excess Deferred Income Tax (UP EDIT)
	Reversals Rate Adjustment (Continued)
Sheet No. 142	Revenue Decoupling Adjustment Mechanism
Sheet No. 142-A	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 142-B	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 142-C	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 142-D	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 142-E	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 142-F	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 142-G	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 142-I	Revenue Decoupling Adjustment Mechanism (Continued)
Sheet No. 448-I	Power Supplier Choice (Continued)
Sheet No. 449-I	Retail Wheeling Service (Continued)
	Sheet No. 141Z-H Sheet No. 141Z-I Sheet No. 141Z-J Sheet No. 141Z-J Sheet No. 141Z-K Sheet No. 142-K Sheet No. 142-A Sheet No. 142-A Sheet No. 142-D Sheet No. 142-D Sheet No. 142-F Sheet No. 142-F Sheet No. 142-G Sheet No. 142-I Sheet No. 142-I Sheet No. 142-I Sheet No. 448-I

On June 20, 2019, Puget Sound Energy ("PSE" or the "Company") filed with the Commission revisions to its currently effective Tariff WN U-60, Tariff G, Electric Service, and Tariff WN U-2, Natural Gas, which were assigned Dockets UE-190529 and UG-190530, respectively. The filings would increase rates and charges for electric and natural gas service provided to PSE's customers in the state of Washington. PSE requested an increase in its annual electric revenue requirement of approximately \$140 million (6.9 percent), and an increase to its annual natural gas revenue requirement of approximately \$65.5 million (7.9 percent). On July 5, 2019, the Commission suspended the tariff revisions, consolidated Dockets UE-190529 and UG-190530, and initiated PSE's general rate case ("GRC Dockets"). These two consolidated dockets were also consolidated with the following dockets: UE-171225, UG-171226, UE-190274, UG-190275, UE-190991 and UG-190992.

The primary purpose of this filing is to comply with the portion of the Commission's Order 08, Final Order Rejecting Tariff Sheets; Authorizing and Requiring Compliance Filing ("Order 08"), modified by the Commission's Order 10, Granting Motion for Clarification and Order 11, Other Order; Granting Motion to Extend Compliance Filing Deadline, in consolidated Dockets UE-190529 and UG-190530 ("Orders") that addresses electric rates. PSE is submitting a separate filing of its natural gas tariff sheets in compliance with the Orders under the Company's advice number 2020-30. The attached revised electric tariff sheets reflect the form and rates authorized by these Orders.

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This filing makes an additional change from Revised Appendix A to Order No. 10. In paragraph 155 of Order 08, the Commission ordered that PSE would not include a return on Advanced Meter Infrastructure ("AMI") in its rates. The Commission presented its calculation of the revenue requirement based on their order in Appendix A. In reflecting paragraph 155 in Revised Appendix A, the Commission removed a rate base adjustment included in the original filing that contained only amounts associated with the pro forma plant¹ included for AMI (January 2019 through December 2019). Therefore, in addition to the pro forma amounts already removed in Revised Appendix A, PSE's compliance filing also removes the test year AMI rate base from the revenue requirement calculation. This is done in order to ensure there is no AMI rate base included in PSE's rates in compliance with paragraph 155. The test year AMI rate base can be found in Public Counsel witness Mark Garrett's Exhibit MEG-03 tab "AMI". This change results in an additional reduction to the revenue requirement of \$5.0 million for electric and \$1.9 million for natural gas from what was included in Revised Appendix A.

Additionally, PSE requests review and separate approval of Exhibit A-1, which is necessary for the operation of the PCA mechanism that determines the power cost imbalance for sharing calculation. Exhibit A-1, which is in calculated in compliance with the Orders, is contained within the workpaper named "190529-30-PSE-WP-SEF-23.01E-Exhibit-A-1-19GRC-01-2020".

In compliance with the Orders, PSE is including in this compliance filing a report updating the balance of the unrecovered, undepreciated plant balance of Colstrip Units 1 and 2. PSE previously reported that the unrecovered, undepreciated plant balance for Colstrip 1 and 2, as of the December 31, 2019, retirement date is \$125.5 million. Because PSE continues to recover Colstrip 1 and 2 depreciation in base rates through the date rates are set in this compliance filing, the Orders require PSE to provide an additional update on the regulatory asset balance. As such, PSE is submitting with this filing a separate compliance report that provides the regulatory asset balance as of September 30, 2020 which includes amortization taken through that date. This report can be found in the file named "190529-30-Advice-2020-29-PSE-Cmpl-Col-1-and-2-Reg-Asset-Rpt-(09-23-20).xlsx".

As required by WAC 480-07-883(2) a copy of this compliance filing is being served on each party to this proceeding. The filing is being served via email. The work papers are being sent separately today *via* email from "LeapFILE Secure File Transfer Service".

The enclosed revised tariff sheets reflect issue dates of September 23, 2020, and effective dates of October 1, 2020 by authority of the Washington Utilities and Transportation Commission in Dockets UE-190529 and UG-190530 (Consolidated). Work papers that demonstrate the derivation of the rates proposed to be changed by the enclosed tariff sheets are being provided to the parties in electronic format. Due to size, work papers will be provided separately *via* email as described above.

¹ See Exh. SEF-1Tr page 52 lines 5 through 9.

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The work papers supporting rate design contain sensitive commercial and customer specific information; therefore, the Company respectfully requests that the files marked "SHADED INFORMATION DESIGNATED AS CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKETS UE-190529 AND UG-190530" on the versions of the electronic files containing confidential materials be treated as confidential under the provisions of WAC 480-04-160 and the protective order in this docket.

Please contact Veronica Martin at (425) 457-5624 or veronica.martin@pse.com or Julie Waltari at (425) 456-2945 or julie.waltari@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. Pílíarís

Jon A. Piliaris - Director, Regulatory Affairs Puget Sound Energy PO Box 97034, EST-07W / Bellevue, WA 98009-9734 (425) 456-2142 / Jon.Piliaris@pse.com

- cc: Sheree Carson, Perkins Coie Service List
- Attachments: Electric Tariff Sheets, Listed Above Colstrip Report Certificate of Service