



Puget Sound Energy
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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

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

**Re: Docket UG-190530 (Advice No. 2020-30) – Do Not Redocket
PSE’s Natural Gas 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:

14 th Revision	Sheet No. 116-A	General Gas Lighting and Street Lighting Service (Optional) (Continued)
59 th Revision	Sheet No. 123	Residential General Service
55 th Revision	Sheet No. 131	Commercial and Industrial General Service
9 th Revision	Sheet No. 131T	Distribution System Transportation Service (Firm-Commercial and Industrial)
61 st Revision	Sheet No. 141	Large Volume High Load Factor Gas Service (Optional)
22 nd Revision	Sheet No. 141-A	Large Volume High Load Factor Gas Service (Optional) (Continued)
9 th Revision	Sheet No. 141T	Distribution System Transportation Service (Firm-Large Volume High Load Factor)
9 th Revision	Sheet No. 141T-A	Distribution System Transportation Service (Firm-Large Volume High Load Factor) (Continued)
15 th Revision	Sheet No. 153-B	Propane Service (Continued)
27 th Revision	Sheet No. 171	Residential Water Heater Rental Service
28 th Revision	Sheet No. 172	Large Volume Water Heater Rental Service
22 nd Revision	Sheet No. 174	Gas Conversion Burner Rental Service
22 nd Revision	Sheet No. 185-C	Interruptible Gas Service with Firm Option (Continued)
21 st Revision	Sheet No. 185-D	Interruptible Gas Service with Firm Option (Continued)
9 th Revision	Sheet No. 185T	Distribution System Transportation Service (Interruptible with Firm Option)
6 th Revision	Sheet No. 185T-A	Distribution System Transportation Service (Interruptible with Firm Option) (Continued)

22 nd Revision	Sheet No. 186-C	Limited Interruptible Gas Service with Firm Option (Optional) (Continued)
18 th Revision	Sheet No. 186-D	Limited Interruptible Gas Service with Firm Option (Optional) (Continued)
7 th Revision	Sheet No. 186T	Distribution System Transportation Service (Interruptible with Firm Option)
8 th Revision	Sheet No. 186T-A	Distribution System Transportation Service (Interruptible with Firm Option) (Continued)
23 rd Revision	Sheet No. 187-D	Non-Exclusive Interruptible Gas Service w/ Firm Option (Continued)
7 th Revision	Sheet No. 187T	Distribution System Transportation Service (Non-Exclusive Interruptible with Firm Option)
8 th Revision	Sheet No. 187T-A	Distribution System Transportation Service (Non-Exclusive Interruptible with Firm Option) (Continued)
1 st Revision	Sheet No. 1106-C	Deferred Account Adjustment (Continued)
Original	Sheet No. 1106-D	Deferred Account Adjustment (Continued)
5 th Revision	Sheet No. 1141-A	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 1141-B	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 1141-C	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 1141-D	Expedited Rate Filing Rate Adjustment (Continued)
3 rd Revision	Sheet No. 1141-E	Expedited Rate Filing Rate Adjustment (Continued)
1 st Revision	Sheet No. 1141X	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment
1 st Revision	Sheet No. 1141X-A	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 1141X-B	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 1141X-C	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
1 st Revision	Sheet No. 1141X-D	Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment (Continued)
Original	Sheet No. 1141Z	Unprotected Excess Income Tax (UP EDIT) Reversals Rate Adjustment
Original	Sheet No. 1141Z-A	Unprotected Excess Income Tax (UP EDIT) Reversals Rate Adjustment (Continued)
6 th Revision	Sheet No. 1142-A	Revenue Decoupling Adjustment Mechanism (Continued)
6 th Revision	Sheet No. 1142-B	Revenue Decoupling Adjustment Mechanism (Continued)
9 th Revision	Sheet No. 1142-C	Revenue Decoupling Adjustment Mechanism (Continued)
4 th Revision	Sheet No. 1149	Cost Recovery Mechanism for Pipeline Replacement (CRM)

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 natural gas rates. PSE is submitting a separate filing of its electric tariff sheets in compliance with the Orders under the Company's advice number 2020-29. The attached revised natural gas tariff sheets reflect the form and rates authorized by these Orders.

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.

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

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

Mr. Mark L. Johnson, Executive Director and Secretary

September 23, 2020

Page 4 of 4

to the parties in electronic format. Due to size, work papers will be provided separately *via* email as described above.

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. Piliaris

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: Natural Gas Tariff Sheets, Listed Above
Certificate of Service