

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

April 9, 2024

Filed Via Web Portal

Jeff Killip, Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

Re: Advice No. 2024-18

PSE's Natural Gas Tariff Filing - Filed Electronically

Dear Executive Director Killip:

Puget Sound Energy ("PSE") hereby submits proposed revisions to rates under natural gas Schedule 111, Greenhouse Gas Emissions Cap and Invest Adjustment. This tariff filing, pursuant to RCW 80.28.060 and Chapter 480-80 WAC, includes the following natural gas tariff sheets:

WN U-2 - (Natural Gas Tariff):

2 nd Revision	Sheet No. 1111-B.1	Greenhouse Gas Emissions Cap and Invest Adjustment
		(Continued)

The purpose of this filing is to revise the Special Term and Conditions section of Schedule 111, clarifying that the amount of the non-volumetric monthly State Carbon Reduction Credit ("Credit") shall not exceed a customer's total monthly State Carbon Reduction Charge ("Charge") amount billed for Schedules 16, 23, 31, and 31T beginning July 1, 2024.

In 2023, PSE began to experience below average volume customers receiving excess benefit, which provides a reverse incentive to use more gas because the non-volumetric Credit received exceeds the total Charge amount with any remaining Credit being applied to base revenues or resulting in overall account credits. Effective December 1, 2023, the Commission approved a revision to Schedule 111¹ similar to what is being proposed in this filing, to clarify that any the amount of the non-volumetric monthly Credit shall not exceed a customer's total monthly Charge for all rate schedules, with the exception of Schedules 16, 23, 31, and 31T. For the same reasons described above, PSE is now proposing the same treatment of customers taking service

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¹ Docket UG-230899

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under rate Schedules 16, 23, 31, and 31T. PSE is respectfully requesting an effective date in this filing of May 10, 2024, so that the Company may complete the necessary programming of its billing system in a timely manner prior to implementation by its target date of July 1, 2024. Any residual Credit amount would be deferred in aggregate for future Credit applications.

The tariff sheet described herein reflects an issue date of April 9, 2024 and effective date of May 10, 2024. Posting of proposed tariff changes, as required by WAC 480-90-193, is being accomplished by posting the proposed tariff sheet on the PSE web site coincident with the date of this transmittal letter.

Please contact Veronica Martin at <u>veronica.martin@pse.com</u> for additional information about this filing. If you have any other questions, please contact me at <u>Birud.Jhaveri@pse.com</u>.

Sincerely,

/s/ Birud D. Jhaveri

Birud D. Jhaveri Director, Regulatory Affairs Puget Sound Energy PO Box 97034, BEL10W Bellevue, WA 98009-9734 Birud.Jhaveri@pse.com

cc: Tad O'Neill, Public Counsel Sheree Carson, Perkins Coie Ed Finklea, AWEC

Attachments: Natural Gas Tariff Sheet, listed above

PROPOSED

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PUGET SOUND ENERGY Natural Gas Tariff

SCHEDULE 111 GREENHOUSE GAS EMISSIONS CAP AND INVEST ADJUSTMENT (Continued)

SPECIAL TERMS AND CONDITIONS: (Continued)

- 3. The State Carbon Reduction Credit is applicable only to a Customer that has been determined eligible.
- 4. With the exception of those Customers taking service under Schedules 16, 23, 31, and 31T, this monthly credit shall not exceed the total amount of the Customer's monthly State Carbon Reduction Charge during the billing period, beginning on April 1, 2024.
- 5. For those Customers taking service under Schedules 16, 23, 31, and 31T, this monthly credit shall not exceed the total amount of the Customer's monthly State Carbon Reduction Charge during the billing period, beginning on July 1, 2024.
- 6. A Customer taking optional service under Supplemental Schedule 137, Carbon Offset
 Service will not receive any participation credits for rates under this schedule.
- 7. Schedule 138 Voluntary Renewable Natural Gas ("RNG") participants will be eligible to receive a RNG Participation Credit to be calculated by multiplying the number of therms per block of RNG reflected in Schedule 138 by the total number of blocks the Customer purchases each month, and then multiplied by the State Carbon Reduction Charge. This will have the effect of acting like a credit to reduce the State Carbon Reduction Charge equal to the amount of Renewable Natural Gas therm purchases comparable to the purchased block(s).

(Continued on Sheet No. 1111-C)

Issued: April 9, 2024 Effective: May 10, 2024

Advice No.: 2024-18

Issued By Puget Sound Energy

Birud D. Jhaveri **Title:** Director, Regulatory Affairs

By: