



October 1, 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: Docket UE-240683 (Advice No. 2024-35)
Puget Sound Energy’s Electric Tariff Revision – Do Not Redocket**

Dear Executive Director Killip:

Puget Sound Energy (“PSE”) hereby submits in connection with Docket UE-240683 the following revised electric tariff sheet as a substitution for the tariff sheet that accompanied its September 11, 2024 filing, submitted under Advice No. 2024-35.

13 th Revision	Sheet No. 83-B	Electricity Conservation Service (Continued)
15 th Revision	Sheet No. 83-C	Electricity Conservation Service (Continued)

The purpose of this substitute filing is to correct a scrivener’s error in the shorthand of “Commerce” on Sheet 83-B and in the acronym “NEEA” on Sheet 83-C.

The tariff sheet described herein reflects the original issue date of September 11, 2024, and the original effective date of October 11, 2024. 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.

Please contact Veronica Martin at veronica.martin@pse.com for additional information about this filing. If you have any other questions, please contact me at birud.jhaveri@pse.com.

Sincerely,

/s/ Birud D. Jhaveri

Birud D. Jhaveri
Director, Regulatory Affairs
Puget Sound Energy
PO Box 97034, BEL10W

Jeff Killip, Executive Director and Secretary
October 1, 2024
Page 2 of 2

PROPOSED

Bellevue, WA 98009-9734
Birud.Jhaveri@pse.com

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

Attachments: Electric Tariff Sheet (listed above)



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**RE: Advice No. 2024-35
Puget Sound Energy’s Electric Tariff Revision**

Dear Executive Director Killip:

Pursuant to RCW 80.28.060 and WAC 480-80-101 and -105, please find enclosed for filing the following proposed revisions to the WN U-60, tariff for electric service of Puget Sound Energy (“PSE” or the “Company”):

14 th Revision	Sheet No. 83-A	Electricity Conservation Service
13 th Revision	Sheet No. 83-B	Electricity Conservation Service (Continued)
15 th Revision	Sheet No. 83-C	Electricity Conservation Service (Continued)
18 th Revision	Sheet No. 83-D	Electricity Conservation Service (Continued)
5 th Revision	Sheet No. 83-E	Electricity Conservation Service (Continued)
3 rd Revision	Sheet No. 249-B	Electricity Energy Efficiency Program

The purpose of this filing are to update electric Schedule 83 Electricity Conservation Service to incorporate the definition of Demand Response Programs, consistent with RCW 19.405.090. Additionally, this filing updates electric Schedule 249A Electricity Energy Efficiency Program to revise the existing definition of Demand Response Programs, as the previous definition was written prior to PSE administering Demand Response Programs and is no longer entirely accurate. Interested parties were given the opportunity to review these draft tariff sheets beginning on August 2, 2024.

The tariff sheets described herein reflect an issue date of September 11, 2024, and effective date of October 11, 2024. 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.

Please contact Veronica Martin at veronica.martin@pse.com for additional information about this filing. If you have any other questions, please contact me at birud.jhaveri@pse.com.

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September 11, 2024
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/s/ Birud D. Jhaveri

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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

Attachments: Electric Tariff Sheets (listed above)

**PUGET SOUND ENERGY
Electric Tariff G**

**SCHEDULE 83
ELECTRICITY CONSERVATION SERVICE (Continued)**

4. **DEFINITIONS:** Unless specifically indicated, the following terms when used in this schedule and in Energy Efficiency Schedules numbered between 200 and 299 shall have the meanings given below:
- a. **Avoided Cost**, also known by the terms Conservation Cost Effectiveness Standard or Energy Efficiency Cost Effectiveness Standard herein for conservation/energy efficiency activities and/or Measures is based on the market costs—projected by a power costing model—the Company would otherwise incur to provide energy and capacity from a generation source, either directly or indirectly or by contract plus credits for externalities and line losses and transmission/system distribution system benefits.
 - b. **Building Commissioning** is the process of verifying and documenting that the performance of building systems meets the design, intent, or the owner’s current operational requirements.
 - c. **Conservation** means any reduction in electric power consumption that results from increases in the efficiency of energy use, production or distribution or from demand response, load management or efficiency measures that reduce peak capacity demand. Energy Efficiency Programs in this tariff are for the purpose of achieving Conservation.
 - d. **Demand Response Programs or DR** refers to activities designed to encourage Customers to reduce electrical Demand on the Company by modifying patterns of electricity usage, including the timing and amount of Demand, consistent with RCW 19.405.020. Demand Response covers a broad range of load-shifting services ranging from the Company having control over connected devices (e.g. smart thermostat) to using messages and public appeals to ask Customers to voluntarily reduce electrical Demand (and therefore use) during Peak Demand periods. Demand Response may include measures or incentives to increase or decrease electricity production on the Customer’s side of the meter in response to incentive payments.
 - e. **Energy Code** refers to the currently effective Washington State Energy Code, as amended, including amendments by local jurisdictions.
 - f. **Energy Efficiency Cost Effectiveness Standard** – see Avoided Cost.
 - g. **Energy Efficiency Programs** are programs described in Schedules of this tariff numbered between 200 and 299.
 - h. **Environmental Attribute** is the quantifiable benefit to society associated with displacing electricity generation needs by employing the practice of energy efficiency/conservation.
 - i. **Force Majeure** means factors, events or conditions beyond the control of the Company that negatively impact customer participation in its Energy Efficiency Programs, such as, but not limited to, a local economic recession or natural disaster.

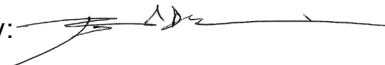
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(K) Transferred to Sheet No. 83-B

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Title: Director, Regulatory Affairs

**PUGET SOUND ENERGY
Electric Tariff G**

**SCHEDULE 83
ELECTRICITY CONSERVATION SERVICE (Continued)**

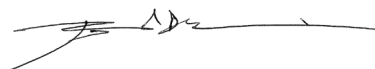
4. **DEFINITIONS:** (Continued) (N)
- j. **Fuel Conversion and Fuel Switching** refer to the act of switching to the use of high efficiency equipment utilizing another fuel for the same end-use, such as the use of natural gas instead of electricity for space heating or water heating and using high efficiency natural gas equipment. For the purposes of this definition, high efficiency is in the Company's sole judgment and means equipment that exceeds the minimum efficiency required by code, where such equipment is feasible and available. (M) (T)
- k. **Incremental Measure Cost** is the incremental cost of an electricity efficient Measure in excess of the cost of a Measure required to satisfy existing codes of conform with existing construction practices. (T)
- l. **Low Income** means those residential households served by the Company that meet income and other requirements that are published in the current U.S. Department of Energy – Washington State Low-Income Weatherization Assistance Plan prepared by the Washington State Department of Commerce ("Commerce"). (M) (T)
- m. **Market Transformation** means effecting permanent changes in the markets for targeted, cost-effective, energy efficiency products and services that will result in sustainable market penetration, without the need for long-term utility incentives. Market Transformation is a temporary market intervention with a clear expectation that involvement will end. (T)
- n. **Measure** is a product, device, piece of equipment, system or building design or operational practice used to achieve greater energy efficiency or to promote Fuel Conversion and Fuel Switching. Unless otherwise enumerated in a specific Energy Efficiency Program, all Measures, proposed by Customers or otherwise, shall meet or exceed the efficiency standards set forth in the applicable energy codes, or, where none exists, "standard industry practice" as determined by the Company. Measures will meet common construction practices, and meet industry standards for quality and energy efficiency. (T)
- o. **Measure Cost** is the known and measurable costs to all parties of purchasing and installing an energy-efficiency Measure at a Customer's facility or Company-owned or operated distribution, transmission or generation facilities, not to include the Company's administrative costs. (T)
- p. **Measure Life** is the expected life (in years) of the savings of a Measure. (T)
- q. **Non-quantifiable Benefits (or Costs):** Benefits (or costs) of undertaking energy efficiency improvements, as determined by society and the utility. Benefits (or costs) may include, but are not limited to: legislative or regulatory mandates, support for regional Market Transformation programs, low income health and safety, low income energy efficiency or experimental and pilot programs. The Company may use these Non-quantifiable Benefits (or Costs) to demonstrate cost-effectiveness based on the Total Resource Cost Test. (K)
- (M) Transferred from Sheet No. 83-A
(K) Transferred to Sheet No. 83-C

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**SCHEDULE 83
ELECTRICITY CONSERVATION SERVICE (Continued)**

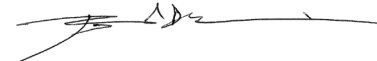
- r. **Northwest Energy Efficiency Alliance (NEEA):** A nonprofit corporation funded by the Company plus other investor and publicly owned utilities in the Northwest region, and BPA. NEEA is governed by a board, on which Puget Sound Energy has the right to appoint one member. (M) |
- s. **Optimization** refers to improving the energy efficiency performance of systems in existing buildings and in existing processes, typically through low-cost operational and maintenance strategies. (M) |
- t. **Performance Basis** refers to the Company determining energy savings through direct measurement of energy usage and/or the use of efficiency indicators. (T)
- u. **Prescriptive Basis** refers to the Company using a standard energy savings amount for a Measure rather than individually calculating energy savings for each specific installation. (T)
- v. **Process Efficiency Improvement** refers to operational and/or equipment changes to improve the energy efficiency of industrial and commercial processes, not including building lighting, comfort conditioning or retail refrigeration. (T)
- w. **Quantifiable Benefits (or Costs):** Non-energy benefits of undertaking energy efficiency improvements, as determined by society or the utility. Benefits (or Costs) may include, but are not limited to: water usage savings or maintenance savings that may be quantified in dollar value. The Company may use these Quantifiable Benefits (or Costs) to demonstrate cost-effectiveness based on the Total Resource Cost Test. (T)
- x. **Reporting Rights** is the right to report the ownership of accrued and accumulated Environmental Attributes and energy savings to any agency, authority or other party, without limitation, or under any past, present or future international, foreign, federal, state or local government or voluntary regulation or trading program, exclusive ownership of the Environmental Attributes. (T)
- y. **Simple Payback** is the estimated installed cost of the energy efficiency Measure divided by the estimated annual dollar savings to the Customer from the Measure. (T)
- z. **Site-Specific Basis** refers to the Company calculating energy savings using the engineering savings determined for each site. (T)
- aa. **Total Resource Cost** is the cost to the Customer and/or other party costs to install or have installed approved Measures plus Utility Costs and minus Quantifiable Benefits (or Costs) (T)

(M) Transferred from Sheet 83-B

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**PUGET SOUND ENERGY
Electric Tariff G**

**SCHEDULE 83
ELECTRICITY CONSERVATION SERVICE (Continued)**

- bb. **Total Resource Cost Test** is a cost-effectiveness calculation which demonstrates that the total benefits, including electricity, natural gas, and other savings benefits (assessed using the Energy Efficiency Cost Effectiveness Standard for electricity and natural gas), exceed total costs including those incurred by the utility, the Customer, and any other contributing party. The benefits and costs not directly associated with electrical energy efficiency in this calculation may fall under Non-quantifiable Benefits) (or Costs) or Quantifiable Benefits (or Costs) as defined above. Where there are a significant amount of Non-quantifiable Benefits (or Costs), then Total Resource Cost may be up to 150 percent of Energy Efficiency Cost Effectiveness Standard, with a Total Resource Cost benefit/cost ratio of 0.667 or greater. (T)
- cc. **Utility Cost** is the Company's costs of administering programs including, but not limited to, costs associated with incentives, audits, analysis, technical review, and funding specific to the Measure or program and evaluation. (T)
- dd. **Utility Cost Test (UTC)** is a cost-effectiveness calculation which demonstrates that the utility energy savings benefits, assessed using the Energy Efficiency Cost Effectiveness Standard, exceed the Utility Cost. (T)

5. DESCRIPTION OF SERVICES:

The Company will provide energy efficiency services in conjunction with individual programs described in Energy Efficiency Schedules numbered between 200 and 299. These services include, but are not limited to the following:

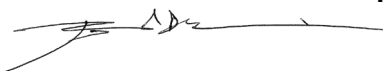
- a. Information, education and training in energy efficiency technologies or practices to encourage undertaking of cost-effective energy efficiency activities and investments.
- b. Incentive application forms and program descriptions.
- c. Analyses, outlined in Section 6 of this Schedule, to identify energy efficiency Measures and opportunities.
- d. Services to facilitate the procurement of energy efficiency Measures, and the adoption of energy efficient practices, including facilitation of access to financing for purchase of Measures. Referrals to private sector designers, consultants, contractors, and installers may also be provided where appropriate.
- e. Funding to encourage the installation of cost-effective Measures where appropriate.
- f. Market Transformation activities that will result in cost-effective and durable market penetration in the Company's distribution service territory, as well as in the Northwest. Cost effectiveness of Market Transformation activities depends heavily on projections of future energy savings impacts in the market.

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**PUGET SOUND ENERGY
Electric Tariff G**

**SCHEDULE 83
ELECTRICITY CONSERVATION SERVICE (Continued)**

- g. Efficiency services for special classes of Customers.
- h. Pilot projects to test new products, technologies, program delivery methods, electric conversion to natural gas, on-site generation of electricity, distribution system benefits or Customer acceptance.
- i. Monitor or measure Energy usage or other efficiency indicators to analyze, verify or evaluate energy efficiency Measures.
- j. Reporting and evaluation of the effectiveness of serviced provided, including participation in the development of regional evaluation protocols.
- k. Conservation savings from the Company's electric generation, transmission and/or distribution facilities.

6. DEMAND RESPONSE PROGRAM ENROLLMENT: By receiving applicable Energy Efficiency products, rebates and incentives under this Schedule, a Customer may automatically be enrolled in their choice of DR Programs, such as PSE Flex – which includes Flex Smart, Flex EV and Flex Rewards. Flex Rewards is the default option to earn additional incentives with no equipment needed. Enrollment does not require the Customer to participate in demand events. (N)

7. ANALYSES: Unless otherwise specified in applicable Energy Efficiency Programs, the Company will use energy savings estimates based on analyses using standard engineering techniques, regionally accepted standards, historical energy use, current operations, existing equipment, on-site data acquisition, Customer input and Measures implemented. The Company reserved the right to modify Customer, owner, tenant or third party energy savings estimates. (T)

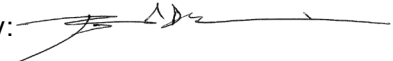
For retrofit Measures, energy savings estimates will use the efficiency of the existing product, device, piece of equipment, system or building design, or operational practice to determine baseline energy use.

For incremental Measures, energy savings estimates will use Energy Code requirements or, where no such code exists, standard industry practice as determined by the Company to determine minimum baseline energy use.

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**PUGET SOUND ENERGY
Electric Tariff G**

**SCHEDULE 249A
ELECTRICITY ENERGY EFFICIENCY PROGRAM
Demand Response Pilot Programs**

1. AVAILABILITY:

To Customers receiving retail, bundled Electric Service under Electric Tariff G of the Company. Demand Response Pilots may be conducted for residential, commercial and industrial classes of Customers. Different strategies may be tested on different Customer classes as appropriate. Eligible Customers will voluntarily enroll in pilots, and have options to participate in demand events. Qualification for participation in a pilot program will be at the discretion of the Company.

2. DEFINITIONS:

- a. **Demand Response Programs or DR:** Activities designed to encourage Customers to reduce electrical Demand on the Company by modifying patterns of electrical usage, including the timing and amount of Demand, consistent with RCW 19.405.020. Demand Response covers a broad range of load-shifting services ranging from the Company having control over connected devices (e.g. smart thermostat) to using messages and public appeals to task Customers to voluntarily reduce electrical Demand (and therefore use) during Peak Demand periods. Demand Response may include measures or incentives to increase or decrease electricity production on the Customer's side of the meter in response to incentive payments.
- b. **Direct Load Control or DLC:** A DR activity by which the Company or program operator remotely shuts down or cycles a Customer's electrical equipment (e.g. air conditioner, water heater) on short notice.
- c. **Incentive-Based Programs:** Programs where Customers are offered incentives, financial or other, to reduce electrical Demand during peak Demand periods on the Company's system.
- d. **Peak Demand:** Electrical Demand for the Company-wide system. Peak Demand may also refer to electrical Demand on a specific portion of the Company's system, such as loads controlled through a specific substation or a specific distribution circuit.
- e. **Peak Information Programs:** Various types of DR programs involving the Company informing Customers about electricity use during peak periods on the Company's system for the purpose of encouraging Demand reduction during those periods. The duration of peak periods is typically several hours during a peak day. Incentives may be used to encourage Customer enrollment.

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