



March 28, 2025

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. 2025-21
Puget Sound Energy’s Natural Gas 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-2, tariff for natural gas service of Puget Sound Energy (“PSE” or the “Company”):

23 rd Revision	Sheet No. 1129	Low Income Program
8 th Revision	Sheet No. 1129-A.1	Low Income Program (Continued)
25 th Revision	Sheet No. 1129-B	Low Income Program (Continued)

The purpose of this tariff filing is to increase the Annual Cap for total benefits available to customers for the remainder of the 2024-2025 Low Income Program Year as well as to increase rates to recover the increase in the Annual Cap. The benefits under Schedule 129 are available to PSE customers meeting the criteria described within that Schedule and are used to offset charges on their bills.

Last program year, PSE experienced a large increase in the volume of applications received for its bill assistance programs. This large increase was attributed to the move to self-attestation and marketing efforts related to the launch of the Bill Discount Rate. With that large increase in applications, PSE determined that additional funding would be needed to provide PSE HELP grants to all of the applications received in the program year. PSE and the Low Income Advisory Committee (“LIAC”) explored several forecast methods together before selecting a forecast method based on the average number of applications received per week in that program year. PSE then increased the cap for the last program year based on that forecast.

Prior to the beginning of the current program year, PSE determined the revenue requirement for the 2024-2025 Low Income Program Year based on the total revenue requirement for the 2023-2024 Low Income Program Year (which included a step increase as discussed above) with small

adjustments made, such as to account for rate increases. Setting the revenue requirement in this way has historically worked well. Considering the step increase taken in the prior year, the Company and the LIAC believed this method would produce a sound forecast for the current program year.

However, even with last year's step increase, PSE has again seen a large increase in the volume of applications received so far this program year over the last program year, leading to a depletion of funds at a greater rate than anticipated. Therefore, in order to ensure that customer needs in the Home Energy Lifeline Program ("HELP") are met, PSE is seeking additional funding for the remainder of the Program Year.

PSE has worked with its LIAC leading up to this filing. On February 20, 2025, the Company presented to the LIAC the current standing of PSE HELP for the remainder of the Program Year and the anticipated need for additional funding. The LIAC had the opportunity to provide feedback and ask questions, and the LIAC indicated support for this tariff filing. The forecasted additional funding need uses the same forecast method, the average number of applications received per week in the current program year that was used for last program year's mid-year increase.

Overall, this proposal represents a total revenue requirement increase of \$42.6 million, with \$7.8 million of that for natural gas customer benefits. The collection of this revenue requirement is being spread over the remainder of the current HELP program year – May 2025 through September 2025 – to allow for immediate access to funding. The average increase for all natural gas customers affected by this tariff change is 3.10 percent increase in overall bills. A typical residential natural gas customer on Schedule 23 using 64 therms per month would experience an increase of \$3.54 per month or 3.67 percent.

RCW 80.28.425(2) outlines a five percent threshold relative to a utility total revenue requirement for tariff schedules that reduce energy burden of low-income residential customers. PSE analysis shows that the level of recovery for spending on tariff schedules that reduce the energy burden of low income residential customers, including this tariff filing, are currently measured at 4.4% (Electric) and 2.5% (Gas) of the total revenue requirement approved by the Commission. Given RCW 80.28.425(2) also requires low income assistance to increase by double the percentage increase in residential base rates approved in each year of a MYRP, PSE estimates these calculations to increase to 5.3% (Electric) and 2.8% (Gas) in October 2025 for the next program year. As PSE funding for ratepayer-funded low-income programs will exceed the 5% threshold for the next program year, PSE would appreciate a discussion and guidance from the Commission in advance of the Company's next low income filing, in September 2025, on what utilities should be expected to do when that calculation crosses the 5% limit.

Bill assistance programs such as PSE's Bill Discount Rate ("BDR"), PSE Home Energy Lifeline Program ("HELP"), the Low Income Home Energy Assistance Program ("LIHEAP"), Past-due Bill Forgiveness (an Arrearage Management Plan which launched in October 2025), and the Salvation Army Warm Home Fund ("WHF") are available to qualified customers who need help with their energy bills. PSE customers can go to pse.com/assistance or call 1-888-225-5773 to learn if they are eligible. Payment plans are also available.

The tariff sheets described herein reflect an issue date of March 28, 2025, and effective date of May 1, 2025. 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 480-90-193. Notice to the public under the provisions of WAC 480-90-194 will be provided within 30 days of the May 1, 2025, effective date.

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

Attachments: Natural Gas Tariff Sheets (listed above)
Work Papers

**PUGET SOUND ENERGY
Natural Gas Tariff**

**SCHEDULE 129
LOW INCOME PROGRAM**

AVAILABILITY/APPLICABILITY: The benefits available under this Low Income Program (“Program”) (as approved in Docket Nos. UE-011570 and UG-011571) are available to Customers of the Company meeting the criteria described herein. The charges under this schedule apply to all Customers of the Company who are billed for therms except Customers taking service under existing special contracts.

BENEFITS:

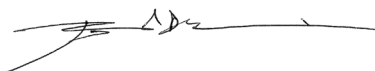
1. Benefits under this Program are available through designated agencies (herein “Agencies”) that:
 - a) meet the criteria for a “Qualifying Organization” as defined in RCW 82.16.0497, b) the Company accepts as capable of performing necessary obligations under this Program, and c) executes a contract with the Company that is: (i) consistent with this schedule, (ii) provides for periodic auditing, and (iii) provides for an annual administration evaluation. The Agencies will ascertain whether specific Customer households seeking assistance with their natural gas bills are eligible for assistance under the Program.
 - a. The Agencies will determine whether a Customer meets the federal definition for Low Income Home Energy Assistance Program (“LIHEAP”) qualification. (i) If the Customer is eligible, they will receive LIHEAP funds in addition to funds under this Program unless or until LIHEAP funds are exhausted. (ii) If the Customer is not eligible to receive LIHEAP funds, but meets the Company criteria, the Customer will be considered for this Program. (iii) If the Customer meets all applicable criteria, the Customer will be eligible to receive assistance under the Company’s Program.
 - b. Total Benefits for the program year (where Total Benefits is equal to benefits to eligible Customers under this Program plus the Agencies’ administrative fees and the Company’s program costs) under this Program and the Total Benefits of the Low Income Program under the Company’s electric tariff are subject to a combined Annual Cap of \$124.421 million, (I)
provided that Total Benefits not expended in one program year will be included in Total Benefits for the following program year and be allocated along with funding for the current program year. The Annual Cap for the program year is allocated into Annual Caps of \$104.302 million for electric and \$20.119 million for natural gas Low Income Programs. Total (I) (I)
Benefits are equal to the Annual Caps plus carry-over of funds not expended in the prior year.
 - c. A qualifying Customer may receive assistance through this Program once during a program year. Customers shall be requalified annually by one of the Agencies (except where noted otherwise). Total benefits to an individual eligible Customer under this program are subject to an annual cap equal to the sum of (i) the LIHEAP cap (currently \$1,000.00) and (ii) the benefit amount specifically for the applicable Schedule 171 charges.

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Issued By Puget Sound Energy

By:



Birud D. Jhaveri

Title: Director, Regulatory Affairs

**PUGET SOUND ENERGY
Natural Gas Tariff**

**SCHEDULE 129
LOW INCOME PROGRAM (Continued)**

FUNDING:

1. There will be a prescribed agency administrative fee structure based on actual costs to local contractors to operate the LIHEAP program in Washington State. The administrative fees paid to Agencies will be considered part of the Total Benefits paid under this Program. Funding of benefits under this Program will be allocated in the Company's service area proportionate to LIHEAP payments to PSE for natural gas in the most recent LIHEAP fiscal year.
2. There will be a surcharge on all natural gas Energy (therms, either delivered or minimum quantity) and all electric Energy (kWh) to all customers classes that will be subject to an annual true-up to reflect changes in billing determinants so that the Annual Cap of \$124.421 million under the natural gas and electric Low Income Programs are equal to the Funding amounts collected by this schedule, plus the Electric Schedule 129, minus the effect of all of the Company's revenue sensitive costs such as taxes. (I)

RATE: The surcharge rate is shown on the following sheet shall be added to the rate(s) shown on each schedule for natural gas service.

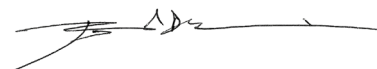
(Continued on Sheet No. 1129-B)

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**PUGET SOUND ENERGY
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**SCHEDULE 129
LOW INCOME PROGRAM (Continued)**

SCHEDULE 23

Delivery Charge: \$0.06854 per therm (I)

SCHEDULES 31 & 31T

Delivery Charge: \$0.04764 per therm (I)

SCHEDULES 41 & 41T

Delivery Charge: \$0.01874 per therm (I)

SCHEDULE 53

Delivery Charge: \$0.06854 per therm (I)

SCHEDULES 87, 87T & 88T

Delivery Charge:	First 25,000 therms per month:	\$0.01081 per therm	(I)
	Next 25,000 therms per month:	\$0.00652 per therm	I
	Next 50,000 therms per month:	\$0.00415 per therm	I
	Next 100,000 therms per month:	\$0.00267 per therm	I
	Next 300,000 therms per month:	\$0.00191 per therm	I
	All over 500,000 therms per month:	\$0.00129 per therm	(I)

SCHEDULES 85 & 85T

Delivery Charge:	First 25,000 therms per month:	\$0.01081 per therm	(I)
	Next 25,000 therms per month:	\$0.00652 per therm	I
	All over 50,000 therms per month:	\$0.00370 per therm	(I)

SCHEDULES 86 & 86T

Delivery Charge: \$0.01645 per therm (I)

ADJUSTMENTS:

Rates in this schedule and those rates reflected in the schedules for natural gas sales and transport service to which the surcharge in the Funding and Rate sections above apply, are subject to adjustment by such other schedules in this tariff as may apply.

GENERAL RULES AND REGULATIONS:

Service under this schedule is subject to the Rules and Regulations contained in this tariff as they may be modified from time to time and other schedules of such tariff that may from time to time apply as they may be modified from time to time.

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