



July 11, 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. 2024-27
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”):

WN U-2 - (Natural Gas Tariff):

Original	Sheet 1129-A.7	Low Income Program (Continued)
Original	Sheet 1129-A.8	Low Income Program (Continued)

Purpose of Filing and Background

On June 30, 2023, PSE submitted a Subsequent Filing pursuant to paragraphs 11 and 263 of Final Order 24/10 (“the Order”) in Dockets UE-220066, UG-220067, and UG-210918 (Consolidated) in which it provided its Arrearage Management Plan (“AMP”) Design. The purpose of this filing is for PSE to offer the AMP as an optional service as part of its efforts to develop and enhance its services for low-income customers and to help ensure that customers have access to energy that is affordable, safe, and sustainable. PSE is proposing to establish the AMP as a part of its existing natural gas Schedule 129 Low Income Program.

Interested Party Engagement

Prior to this filing and as described in the Order, PSE launched a project which included the forming of a small work group to develop the AMP through the Low-Income Advisory Committee (“LIAC”) process. PSE held meetings with the LIAC small work group on September 28, 2023, October 26, 2023, November 13, 2023, November 27, 2023, and April 26, 2024. Topics ranged broadly across requirements of the program. Some of the larger areas of discussion included; the program goals and enrollment requirements, the requirements and processes surrounding program application, and the marketing and communications plan.

Additionally, PSE provided a copy of its draft tariff schedule language to the working group for review on June 27, 2024.

Cost Recovery

The costs of benefits provided by the AMP will be collected under natural gas Schedule 129 Low Income Program. PSE consulted with the LIAC prior to making this filing for Commission approval.¹

The Customer Experience

Customer engagement and enrollment will begin on October 1, 2024, concurrent with the launch of the AMP service, which will also be referred to as Past Due Bill Forgiveness. A Customer may contact the Company or designated agencies that meet the criteria for a “Qualifying Organization” as defined in RCW 82.16.0497 to collectively enroll in this Schedule and other bill assistance programs. To gain visibility and customer engagement, PSE is planning the following customer engagement elements:

- The AMP service will be added to the existing Payment Assistance web page: <https://www.pse.com/en/account-and-billing/assistance-programs>
- In addition to linking to the application portal, the AMP program page on pse.com will direct customers to the application portal to apply for the service. The purpose of this call to action is to drive customers towards completing the application process and taking advantage of automatic and frequent eligibility review.
 - Any customer who has applied to the AMP program and is found to be eligible during these reviews will be enrolled in the AMP program, and be notified via email and/or information printed on the customer’s bill.
- Program support – Beginning October 1, 2024, PSE will engage in a bilingual campaign for two distinct audiences.
 - Primary audience of about 12,000 customers, already enrolled in an assistance program, owing \$300-\$2,500, are 30+ days past due, and have made at least one on time payment.
 - Secondary audience of about 46,000 customers, believed to be income eligible, are 30+ days past due, and not currently enrolled in an assistance program.
- Further, AMP is a tertiary program within PSE’s suite of assistance offerings, and will organically be discovered by users who receive marketing for PSE HELP and the Bill Discount Rate program.

PSE Roles and Obligations

PSE will open the AMP for enrollment beginning on October 1, 2024. To enroll in the AMP, a customer must declare their eligibility during the enrollment process. The AMP will incrementally reduce a customer’s past due balance over 12 bill periods by providing an incentive for each on-time payment of the customer’s current bill in the form of a bill credit. The

¹ Agreement Section G Low Income Issues, Settlement Stipulation and Agreement on Revenue Requirement and All Other Issues Except Tacoma LNG and PSE Green Direct Program in consolidated Dockets UE-220066, UG-220067 and UG-210918

AMP will commence with the customer's normal billing cycle for that specified account under which the customer is taking service.

The tariff sheets described herein reflect an issue date of July 11, 2024, and effective date of August 10, 2024. Posting of proposed tariff changes, as required by WAC 480-90-193, is being accomplished by posting the proposed tariff sheets on the PSE web site coincident with the date of this transmittal letter.

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)

**PUGET SOUND ENERGY
Natural Gas Tariff**

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

ARREARAGE MANAGEMENT PLAN (“AMP”) SECTION

(N)

AMP AVAILABILITY: The benefits available under this Arrearage Management Plan (“AMP”) are available beginning October 1, 2024, to Customers taking Gas Service on Schedule 23, who are also receiving service under Schedule 23BDR at the time of enrollment.

AMP PURPOSE: The AMP, also referred to as Past Due Bill Forgiveness, incrementally reduces a Customer’s past due balance, or “arrearage”, over 12 bill periods by providing an incentive for each, on-time payment of a Customer’s current bill in the form of a bill credit (one-twelfth of the past due balance), with a maximum benefit of \$2,500 per enrollment. Enrollment in the AMP will prevent the disconnection of service for a Customer with a past due balance.

AMP ELIGIBILITY: A Customer may participate in this service once every 2 years (from the date of the prior enrollment). To enroll in this service under this Schedule, a Customer must:

- A. Meet the income eligibility requirements set forth in natural gas Schedules 23BDR and 129 of this tariff,
- B. Declare their eligibility during the enrollment process,
- C. Have received bill assistance through the PSE HELP program during the current Program Year at the time of enrollment, and
- D. Be past due by a minimum dollar amount and amount of time as determined by the Company.

AMP ENROLLMENT: The Customer must complete the Company’s enrollment process to participate in this service. Initiation of service under this Schedule will occur following acceptance and processing of the enrollment request by the Company. A Customer may contact the Company or designated agencies that meet the criteria for a “Qualifying Organization” as defined in RCW 82.16.0497 to collectively enroll in this Schedule and other bill assistance programs. In order to maintain enrollment in service under this Schedule, the Customer must pay their most current charges on time and in full, with a limited number of late or missed payments allowed during the enrollment term. A Customer must pay (catch-up on) charges for bill periods when a payment has been missed or late.

(Continued on Sheet No. 1129-A.8)

Issued: July 11, 2024
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Issued By Puget Sound Energy

By:  Birud D. Jhaveri

Title: Director, Regulatory Affairs

PROPOSED

**PUGET SOUND ENERGY
Natural Gas Tariff**

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

AMP DE-ENROLLMENT BY COMPANY: If the Customer has three missed and/or late payments, they will be removed from this service. Upon successful completion of the terms of their AMP, a Customer will be de-enrolled from this service. De-enrollment from this Schedule will be effective during the billing period for which it occurs.

(N)

AMP DE-ENROLLMENT BY CUSTOMER: The Customer must contact the Company via phone call prior to their desired termination date of the service. Termination of service under this Schedule will follow receipt and processing of the termination by the Company. Although there is no minimum term for this service, the Customer will only be eligible for this service once every 2 years (from the date of prior enrollment).

AMP FUNDING: The benefits provided under the AMP are collected under electric and natural gas Schedule 129 Low Income Programs as of October 1, 2024.

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(Continued on Sheet No. 1129-B)

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