February 10, 2011

Tom DeBoer Director, Federal & State Regulatory Affairs Puget Sound Energy P.O. Box 97034 Bellevue, WA 98009-9734

Re: Puget Sound Energy's Modified Electric Reliability Reporting Plan Docket UE-110060

Dear Mr. DeBoer:

On December 13, 2010, Puget Sound Energy (PSE) filed a modification to its annual electric reliability monitoring and reporting plan¹ as required under WAC 480-100-393, and in compliance with Order 17 of consolidated Dockets UE-072300 and UG-072301.² PSE filed a substitute annual electric reliability monitoring and reporting plan (Proposed Plan) on January 19, 2011. PSE's Proposed Plan describes what will be included in its annual electric system reliability reports filed pursuant to WAC 480-100-398. The annual electric system reliability report will include:

- 1) Four versions of two reliability statistics, SAIDI³ and SAIFI,⁴ to capture full-system reliability performance. These will include all outages (Total Annual), outages where 5% of customers are out of service (5%), outages based on a statistical analysis of the breakpoint between day-to-day operations and major events (IEEE), and the 5-year-average of all outages (Total 5 years avg). 2003 will be the baseline year for all four of its versions of SAIDI and SAIFI;
- 2) Outage causes;
- 3) Customer complaint information, and explain how it uses customer complaint information in its circuit reliability evaluations as required.⁵

¹ Initial Reporting Plan filed January 18, 2002, in Docket UE-011429. Supplemental Report Outline filed March 8, 2006, in Docket UE-060391.

² WUTC v. Puget Sound Energy, Inc., Dockets UE-072300 and UG-072301, Order 17 (November 29, 2010).

³ System average interruption duration index defined as outage minutes per customer.

⁴ System average interruption frequency index defined as outage events per customer.

⁵ WUTC v. Puget Sound Energy, Inc., Dockets UE-072300 and UG-072301, Order 12 at Appendix D: Partial Settlement Stipulation Re: Service Quality, Meter and Billing (October 8, 2008), Page 8, Section F.

Docket UE-110060 Tom DeBoer February 10, 2010 Page 2

The annual electric service reliability report will be filed on or before March 31.

The Proposed Plan has been discussed with commission staff members and is expected to produce annual electric system reliability reports that continue to provide accurate, timely information on customer service reliability. PSE's modified electric reliability monitoring and reporting plan is deemed consistent with WAC 480-100-393, and is accepted by the commission.

Questions about the contents of this letter should be addressed to Ms. Deborah Reynolds at <u>dreynold@utc.wa.gov</u> or 360-664-1255.

Sincerely,

David W. Danner Executive Secretary