

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Relating to the Commission's Proceeding to
Develop a Policy Statement Addressing
Alternatives to Traditional Cost of Service
Ratemaking

DOCKET U-210590

COMMENTS OF PUBLIC COUNSEL

September 6, 2022

1. The Public Counsel Unit of the Washington Attorney General’s Office (Public Counsel) files these comments and the accompanying metrics workbook in response to the Washington Utilities and Transportation Commission’s (Commission) Notice of Opportunity to File Written Comments dated August 5, 2022 (Notice). In that Notice, the Commission established goals/outcomes and metric design principles for utility performance metrics and requested that interested parties identify the metrics that should be used to evaluate utility performance under each of the outcomes and explain why.¹ The Commission also listed multiple sub-questions and provided an Excel workbook template for responses. Public Counsel has prepared the attached Excel workbook with its proposed metrics.

2. The metrics proposed by Public Counsel can generally be summarized as serving three different purposes:

1) Improvements on existing metrics: Eleven metrics proposed are existing metrics, but require modification or further development (e.g., definitions are not standardized across utilities, or they have been identified in utility clean energy implementation plans (CEIPs) but have not yet been fully developed).

2) Summarize or expand data already tracked but not reported: Many proposed metrics are based on data that is readily available and/or already tracked by utilities, but is not being reported regularly (such as the frequency of momentary outages or the number of recent years that a worst performing circuit has been identified such).

We believe that the addition of these metrics would require very little incremental

¹ Notice of Opportunity to File Written Comments (issued Aug. 5, 2022) (hereinafter “Notice”).

effort from utilities, but would greatly enhance the quality of information available to regulators and stakeholders.

3) Aim to enhance equity across customers: Many of the remaining metrics proposed by Public Counsel are new primarily in the sense that they compare outcomes in named communities with non-named communities. Historically, most metrics were reported based on system averages, which can obscure inequities. Thus, we have proposed a suite of metrics that seeks to identify the extent to which customers in named communities are benefiting from utility investments and the energy transition. Many of these metrics simply build upon existing metrics (such as reliability metrics that measure outages separately for named- and non-named communities). A few of the equity-focused metrics require new types of data to be collected and reported, such as information regarding utility engagements with named communities, which will help to ensure that utilities comply with the community engagement requirements of the Clean Energy Transition Act (CETA).

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3. Additional information regarding Public Counsel’s proposed metrics can be found in the attached workbook. Public Counsel looks forward to feedback from other stakeholders and to the continued discussion and refinement of metric proposals.

Dated this 6th day of September 2022.

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/s/ 

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