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UTIL. AND TRANSP.
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Via UTC Web Portal

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Sq. Loop SE
P. O. Box 47250
Lacey, Washington 98503

Re: The Energy Project Proposed Metrics, Docket U-210590

Dear Director Maxwell:

On August 5, 2022, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to File Written Comments to propose metrics by September 6, 2022, and then subsequently, to respond to other parties' proposed metrics by September 26. The Energy Project (TEP) respectfully submits the attached spreadsheet of proposed metrics to measure utilities' performance in achieving the Commission's desired goals and outcomes of performance-based regulation.

In addition to identifying metrics, the Commission asked parties to provide a rationale, calculation, data sources and frequency of updates, justifications for deviations from proposed metric principles, and other additional information. TEP agrees that all this information is necessary for the Commission to achieve its goals in this proceeding. However, asking for all of this information in a single comment period causes stakeholders, including TEP, to prioritize their efforts. As a result, certain parts of the Commission's request could receive insufficient attention. It will take significant effort to respond to proposed metrics put forward by parties in a three-week period.

As a result, TEP requests that the Commission ask parties to focus their September 26, 2023, reply comments on other parties' proposed metrics, rationale, data sources, and deviations from design principles. Later, the Commission could identify its selected metrics and ask parties how to calculate those metrics. This two-step process will

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allow each party to first advocate for their preferred metrics and then focus their attention on designing the best calculations for each metric, regardless of their position on the merits of reporting the metric.

TEP thanks the Commission for the opportunity to submit these comments. If you have any questions about these metrics, please contact Brad Cebulko at bcebulko@strategen.com or (510) 296-8481.

Very truly yours,

/s/Yochanan Zakai
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Encl.