

SHUTE MIHALY
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

YOCHANAN ZAKAI
Attorney
yzakai@smwlaw.com

September 16, 2022

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 Metric Calculations, 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. On September 9, 2022, the Commission issued a Notice Clarifying it August 5, 2022, Notice of Opportunity to File Comments. The clarification indicated that the Commission does not envision including specific calculation methods for metrics in the policy statement it issues at end of Phase 1, and that the Commission will provide additional opportunities to for parties to propose and respond to the specific calculations in a later process.

In response to this clarification, The Energy Project (TEP) respectfully submits a revised spreadsheet of proposed metrics to measure utilities' performance in achieving the Commission's desired goals and outcomes of performance-based regulation. This is the same spreadsheet as TEP submitted on September 6, 2022, with the addition of a column including calculations.

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.

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Very truly yours,

/s/Yochanan Zakai
Oregon State Bar No. 130369
SHUTE, MIHALY & WEINBERGER LLP
396 Hayes Street
San Francisco, California 94102
(415) 552-7272
yzakai@smwlaw.com

Encl.