

**Exh. HEN-18  
Dockets UE-220066, UG-220067,  
UG-210918  
Witness: Hanna E. Navarro**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**DOCKETS UE-220066, UG-220067,  
UG-210918 (consolidated)**

**In the Matter of the Petition of**

**PUGET SOUND ENERGY**

**For an Order Authorizing Deferred  
Accounting Treatment for Puget Sound  
Energy's Share of Costs Associated with  
the Tacoma LNG Facility**

**EXHIBIT TO TESTIMONY OF**

**HANNA E. NAVARRO**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE Response to UTC Staff Data Request No. 112*

**July 28, 2022**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-220066 & UG-220067  
Puget Sound Energy  
2022 General Rate Case**

**WUTC STAFF DATA REQUEST NO. 112:**

REQUESTED BY: Hanna Navarro

**Re: Capital Planning**

Does PSE evaluate what any benefit or burden discrepancies between communities or customer types related to grid modernization? (i.e. is there a concentration of AMI in certain communities?)

**Response:**

Puget Sound Energy (“PSE”) objects to WUTC Staff Data Request No. 112 on the grounds that it is vague and ambiguous as to the meaning of “evaluate what any benefit or burden discrepancies.”

PSE does evaluate benefit discrepancies between communities related to grid modernization through its evaluation of reliability performance for communities and circuits. By evaluating reliability by circuit, PSE builds programs that address large discrepancies such as PSE’s focus on communities served from circuits that have the worst reliability. These areas with reliability concerns are generally in rural areas and may not be funded through the traditional optimization. Please see Appendix A to Exh. CAK-5, that shows how various grid modernization programs are directly benefiting highly impacted communities, sorted by column labeled HC, and vulnerable populations, sorted by column labeled VP.

PSE’s CEIP processes will develop an understanding of discrepancies between communities and customer types and how discrepancies will be addressed, whether through customer programs, or DERs, or modernization of the grid. PSE’s grid modernization investments included in the CEIP and more broadly, will specifically support implementation of DERs where they prove valuable based on evolving understanding of discrepancies through the maturing CEIP processes. Please see PSE’s Responses to WUTC Staff Data Request No. 074 and 080 that discuss PSE’s planning enhancements currently underway that will incorporate considerations of equity in future improvements and will focus some investments on resolving defined discrepancies. PSE is already implementing one of many grid modernization tools that highlight opportunities to resolve undefined discrepancies, as provided in PSE’s Response to WUTC Staff Data Request No. 078. The PSE Heatmap provides visibility

to where named communities overlap with areas where there are system constraints. Conventional investments could then be deferred or offset by DER investment, which would provide a resulting benefit to that community. This is just one example of grid modernization investments that may reduce barriers to participation and broader DER application as discussed in Exh. JJJ-3, pg. 174.

Specifically in response to the question that suggests a concentration of Advanced Metering Infrastructure (“AMI”) in certain communities as a discrepancy, PSE offers that AMI is rolled out to all customers, providing no discrepancies relating to benefit or burden based on community or customer type.