

**Exh. HEN-13  
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. 111*

**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. 111:**

REQUESTED BY: Hanna Navarro

**Re: Capital Planning**

On page 30 of Exh. CAK-1T, PSE witness Koch discusses emergency repair processes and states “Emergency repair investments are non-discretionary and unplanned in direct response to notifications of a problem or outage through a variety of internal and external communication channels.” Does PSE measure outage response times between customer types including any differences in response times to highly impacted communities or vulnerable populations.

**Response:**

WUTC Staff Data Request No. 111 appears to be an implicit reference to RCW 19.405.040(8). Puget Sound Energy (“PSE”) objects to the interpretation of RCW 19.405.040(8) that appears to underlie WUTC Staff Data Request No. 111, which PSE views as overly broad and inconsistent with the language and intent of the statute. To the extent this data request seeks to impose or imply requirements on PSE pursuant to RCW 19.405.040(8) that go beyond the scope of Chapter 19.405 RCW, PSE objects.

More specifically, to the extent this data request interprets RCW 19.405.040(8) to apply beyond the transition to clean electricity set forth in Chapter 19.405 RCW, PSE objects to the interpretation. To the extent this data request interprets the statute to mandate that all company investment decisions, policies and procedures are required to expressly address how all customers will benefit from the transition to clean electricity, PSE objects to the interpretation. To the extent this data request fails to recognize the magnitude and length of the clean energy transformation set forth in the statute, and expects an immediate and wholesale revision of PSE’s policies and procedures at this early date when rules have just recently been adopted, PSE objects.

Without waiving these objections and subject thereto, PSE responds as follows: Chapter 19.405 RCW, which was passed less than three year ago, mandates a transition to 100 percent clean electricity that is to take place over a quarter-century, with interim requirements along the way. Rules to implement the statutory mandates were adopted only recently. Subsection (8) of RCW 19.405.040 requires that “in complying with” the transition to clean electricity, an “electric utility must, consistent with

the requirements of RCW 19.280.030<sup>1</sup> and 19.405.140,<sup>2</sup> ensure that all customers are benefiting from the transition to clean energy.” Consistent with the statute, PSE is taking action to ensure that all customers are benefiting from the transition to clean energy over the next twenty-three years, and this is reflected in PSE’s Clean Energy Action Plan, Integrated Resource Plan, Clean Energy Implementation Plan, and performance-based metrics, to name a few.

In addition, PSE developed and adopted a Diversity, Equity & Inclusion Playbook (referred to as the “Playbook”) to present the vision for diversity, equity and inclusion (“DEI”) at PSE, including PSE’s roadmap, focus areas, leadership’s role and how PSE plans to advance its current efforts. DEI is a broader effort of PSE; it is not specific to any statutory mandate but reflects PSE’s corporate commitment to equity. Customers are among the focus areas of the Playbook in which PSE strives for them to have “equitable access to clean energy and experience [PSE] in a manner that reflects our values and their communities.” The purpose of the Playbook “is to articulate a shared vision and strategy roadmap to support our decentralized model for managing DEI” and to “help keep us aligned and moving in the same direction.” The Playbook is attached as Attachment A to PSE’s Response to WUTC Staff Data Request No. 062

With that as a backdrop, PSE identified circuits associated with customers designated within highly impacted communities and vulnerable populations as part of PSE’s CEIP processes and, as a result, PSE can measure the response time associated with these defined circuits. PSE provides the following table of PSE’s response time per PSE SQI #11 for PSE system-wide, highly impacted communities (“HIC”), and for vulnerable populations (“VP”).

<b>Year</b>	<b>PSE</b>	<b>HIC</b>	<b>VP</b>
<b>2020</b>	0:50:39	0:47:18	0:47:01
<b>2021</b>	1:05:21	0:57:33	0:55:36

PSE will report industry reliability measures of SAIDI and SAIFI relative to highly impacted communities and vulnerable populations in the CEIP and proposes to report SAIDI and SAIFI relative to named communities representing both highly impacted communities and vulnerable populations as part of the performance scorecard discussed in the Prefiled Direct Testimony of Mark N. Lowry, Exh. MNL-1T. This is also discussed in the Prefiled Direct Testimony of Catherine A Koch, Exh CAK-1T, pages 51-53. Response times will influence the performance of SAIDI and therefore will be a relevant measure to these proposals.

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<sup>1</sup> Addresses development of integrated resource plans and clean energy action plans.

<sup>2</sup> Requires a cumulative impact analysis to designate the communities highly impacted by fossil fuel pollution and climate change, to be completed by the department of health December 31, 2020, with rules to be adopted by December 31, 2021.