

**Exh. HEN-19
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 Public Counsel Data Request No. 160

July 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

PUBLIC COUNSEL DATA REQUEST NO. 160:

RE: Performance Measures and Incentive Mechanisms, Lowry Exh. MNL-3 at 8 of 73.

Regarding SAIFI and SAIDI in highly impacted communities and vulnerable populations, please:

- a) Explain how PSE determined SAIFI and SAIDI historical data for highly impacted communities and vulnerable populations.
- b) Explain why PSE proposes no target for this metric despite it being measurable.
- c) Explain why the draft scorecard shows reliability tending to be higher in these communities.

Response:

Puget Sound Energy (“PSE”) provides the following in response to Public Counsel Data Request No. 160.

- a) System Average Interruption Duration Index (“SAIDI”) and System Average Interruption Frequency Index (“SAIFI”) in highly impacted communities and vulnerable populations were based on the 2021 Integrated Resource Plan (“IRP”) customer benefit assessment that is documented in the publicly available Appendix K to the IRP¹, page K-7 to K-15. Any circuit that serves either of the defined groups of vulnerable population or highly impacted communities, even if it is just one customer or one foot of distribution line, was defined as a Named Population circuit.
- b) Please see PSE’s Response to WUTC Staff Data Request No. 125. PSE has aligned proposed metrics with PSE’s Clean Energy Transformation Act processes, and specific targets for these metrics are still to be defined through future Clean Energy Implementation Plans as more clean energy programs are developed. PSE’s first step is providing transparency for further evaluation, and establishing a metric would be premature given the ongoing stakeholder

¹https://oohpseirp.blob.core.windows.net/media/Default/Reports/2021/Final/Appendix/22.%20IRP21_AppK_032321.pdf

processes that will shape the appropriate metric and target given all the factors that influence SAIDI and SAIFI. Additionally, as discussed in the Prefiled Direct Testimony of Mark N. Lowry, Exh. MNL-1T, at page 17, the Commission will be developing a policy statement in March 2023 that includes performance measures, and insights from this policy will be helpful in setting targets.

- c) PSE is not able to provide a reason for reliability tending to be better in named populations at this time as the evaluation of this trend is ongoing. At this point, there is not one clear reason, thus more review is needed to understand how subtle differences in circuit characteristics, location, and past investments may have resulted in better reliability.