

**Exh. JBN-3
Dockets UE-220066, UG-220067,
UG-210918
Witness: Joel B. Nightingale**

**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

JOEL B. NIGHTINGALE

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to UTC Staff Data Request No. 148

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. 148:

REQUESTED BY: Joel Nightingale

Re: Energize Eastside

Please provide a summary of (1) the load-shedding events; and (2) the events during which Corrective Action Plans (CAPs) were implemented that affected the Eastside area since 2013. In this summary, please include dates, durations, action taken, number of PSE customers impacted, MW shed (if applicable), and the cause for each event. If any other event occurs which results in a CAP being implemented after PSE files its responses to this request, please identify such events and provide the dates, durations, action taken, number of PSE customers impacted, MW shed (if applicable), and the cause for each event as a supplemental responses to this request. Consider this an ongoing request.

Response:

Puget Sound Energy ("PSE") provides the following in response to WUTC Staff Data Request No. 148.

- 1) PSE implemented one load-shedding event which occurred on July 24, 2018, and affected the Eastside area. This event occurred when transmission lines and equipment were out of service, combined with a pole top fire that required operators to shed load to prevent the overload of equipment. Approximately 4 MW of load serving 2,800 customers in the Juanita area, which is in the City of Kirkland, was dropped.

During the heat dome event on June 28, 2021, a key transmission line was out of service due to a fire leaving PSE one outage away from needing to implement load shedding of approximately 100 MW. The Energize Eastside project would have given operators more flexibility in stabilizing the grid under those strained conditions and avoided potential load shedding.

- 2) Corrective Action Plans ("CAPs") required by the North American Electric Reliability Corporation ("NERC") Standards include both long term solutions and short term interim actions. The Energize Eastside project is PSE's long term CAP per the NERC Reliability Standards. PSE's short term interim CAPs after 2018

were load-shedding because of the system load level. Prior to 2018, CAPs were in place to open transmission lines and shift load to prevent overloads of equipment. The Eastside area is subject to N-1 events where a system element is out of service on a regular basis. Since 2018 there have been almost 90 times when an N-1 event has occurred on the Eastside where the next subsequent outage (N-1-1) would have overloaded a part of the system affecting the Eastside area.

While operations examples like load-shedding discussed above are dealt with in real time, PSE plans its transmission system in compliance with the NERC standards that require forward-looking planning such that a utility does not wait to upgrade infrastructure after the problem has already occurred and affected customer reliability.