

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PUGET SOUND ENERGY

For Penalty Mitigation Associated with Service  
Quality Index No. 11 – Electric Safety Response  
Time Annual Performance for Period Ending  
December 31, 2021

Docket UE- 220216

**PUGET SOUND ENERGY’S  
MOTION FOR CLARIFICATION OF  
INITIAL ORDER**

**I. INTRODUCTION**

1. Pursuant to WAC 480-07-825(3), Puget Sound Energy (“PSE”) respectfully requests the Washington Utilities and Transportation Commission (“Commission”) clarify the initial order issued in this proceeding on October 26, 2023 (“Initial Order”). Through this motion, PSE seeks to clarify the Initial Order and correct an obvious error in the Initial Order’s payment instruction. PSE requests the Commission modify the Initial Order to clarify the item listed below.

**II. DISCUSSION OF POINTS FOR CLARIFICATION**

2. WAC 480-07-825(3) allows parties to seek clarification and changes that do not change the substantive outcome of an initial order. PSE requests clarification and correction of paragraphs 146 and 147 of the Initial Order as to the method of payment. This request is not a substantive change to the outcome of the proceeding, but PSE seeks to correct an obvious error in the payment instruction language of the Initial Order. While PSE is not seeking through this motion to change the substantive outcome of the Initial Order, PSE hereby reserves its right to submit a petition for administrative review pursuant to WAC 480-07-825(2).
3. This matter concerns the penalty amount and the corresponding payment mechanisms associated with PSE’s Service Quality Index (“SQI”). There are specific payment methods triggered by the penalty amount pursuant to previous Commission decisions. In this case,

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OF INITIAL ORDER- 1**

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payment of penalties associated with the SQIs should be allocated to PSE's low income bill assistance program, the Home Energy Lifeline Program (“HELP”), when the annual amount is less than the equivalent of \$12 per customer.<sup>1</sup> Exhibit PRM-4 in this proceeding described the SQI Program Mechanics, as agreed upon and approved from the updated Appendix 2 to Exhibit J in the consolidated Dockets UE-011570 and UG-011571 in compliance with Order 25 of the consolidated Dockets UE-072300 and UG-072301. Specifically,

***F. PAYMENT OF PENALTIES, IF ANY, TO CUSTOMERS***

The Parties agree that when annual penalty dollars are less than the equivalent of \$12 per customer, the annual penalty will be allocated to PSE's low income bill assistance program, the Home Energy Lifeline Program (“HELP”). If the annual penalty amount exceeds \$12 per customer, the Company will place an SQI credit on each customer's bill, rather than allocating the penalty dollars to HELP.

PSE had approximately 1,103,403 electric customers as of December 31, 2021. The total penalty of \$613,636 results in a penalty per customer of about \$0.56 for that year.<sup>2</sup> Accordingly, the penalty should be allocated to PSE's electric HELP as additional HELP funding from PSE's owners. PSE's allocation of the penalty amount to customers via the HELP bill assistance program tariff schedule should (and would, with this proposed clarification) be part of PSE's regularly scheduled annual tariff filing that goes into effect October 1 of each year.

4. Yet, in paragraph 147 of the Initial Order, the presiding officer does not direct the penalty amount to be allocated to PSE's HELP and instead orders payment within 14 days. The Initial Order, therefore, is inconsistent with the required payment process.

5. Therefore, PSE seeks clarification that it is not required to pay the penalty amount within 14 days as ordered in the Initial Order and instead that the penalty amount should be allocated to

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<sup>1</sup> See Exh. PRM-4 at 18, n. 16 (*citing* Order 12 of consolidated Docket Nos. UE-072300 and UG-072301, Appendix D, pp. 5-6, section C).

<sup>2</sup> \$613,636 penalty / 1,103,403 electric customers as of Dec. 2021 = \$0.56 per customer.


PSE's low income bill assistance program, HELP. This clarification resolves inconsistencies in the Initial Order and the process for allocating SQI penalties.<sup>3</sup>

### III. CONCLUSION

6. For the reasons set forth above, PSE respectfully requests that the Commission enter an order clarifying the Initial Order with respect to the single issue identified above.

Respectfully Submitted this 31st day of October, 2023.

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<sup>3</sup> See Exh. PRM-4, p. 18, Updated Appendix 2 to Exhibit J (Dockets UE-011570 and UG-011571) In Compliance with Order 25 of Dockets UE-072300 and UG 072301, PSE'S Service Quality Program—Service Quality Program Mechanics.