

**EXH. AEW-10  
DOCKETS UE-220066/UG-220067  
2022 PSE GENERAL RATE CASE  
WITNESS: AMY E. WHEELLESS**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-220066  
Docket UG-220067**

**NINTH EXHIBIT (NONCONFIDENTIAL) TO  
THE PREFILED RESPONSE TESTIMONY OF**

**AMY E. WHEELLESS**

**ON BEHALF OF NW ENERGY COALITION, FRONT AND CENTERED, AND  
SIERRA CLUB**

**JULY 28, 2022**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**THE ENERGY PROJECT DATA REQUEST NO. 082:**

REQUESTED BY: Simon J. ffitich

**Subject: Performance Measures and Incentive Mechanisms**

**Re: Direct Testimony of Mark Newton Lowry, Exh. MNL-1T, p. 39, lines 11-21**

Please provide the avoided cost calculation workbook that details all the costs and all the benefits used in the avoided cost calculation for determining the EV PIM. Please ensure that the workbook is live, unlocked, with all formulas and links intact.

**Response:**

At this time Puget Sound Energy (“PSE”) has not proposed a value for the avoided costs and benefits for determining the electric vehicle (“EV”) Performance Incentive Mechanism (“PIM”). As such, PSE has not developed a workbook that details the costs and benefits to be used in proposing these values.

When PSE develops the value of the EV PIM, PSE will leverage its most current EV load profiles to identify the difference in anticipated loads for an EV customer participating in a managed load program and a customer not participating in a managed load program. As detailed in the Prefiled Direct Testimony of Dr. Mark N. Lowry, Exh. MNL-1T, p. 39, lines 11-21, PSE will use this difference in load combined with avoided energy costs, avoided generation capacity costs, and avoided transmission and distribution capacity costs to calculate the benefits associated with the PIM. These avoided costs will be derived from the most current avoided costs approved by the Commission at the time of proposing a value for the EV PIM.

A similar methodology was applied to Schedule 556, which PSE filed with the Commission on April 26, 2022 in Docket UE-220294, and which offers a load management incentive. That tariff was allowed to become effective by operation of law at the Commission’s Open Meeting held on May 26, 2022, with an effective date of June 1, 2022.

The load management incentive service (detailed under tariff schedule 556) provides participating customers with an incentive payment for charging their vehicle outside of peak hours (defined within the tariff). The incentive payment is adjusted downward proportionally to the frequency of charging events the customer performs during peak

hours. This incentive payment was designed to provide to participating customers the majority of the benefit that the customer is generating by managing their load. PSE may use this same incentive as the valuation for the benefits associated with the EV PIM.