



PUGET SOUND ENERGY

The Energy To Do Great Things

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July 13, 2012

VIA OVERNIGHT MAIL & ELECTRONIC FILING

Mr. David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

**RE: Docket Nos. UE-072300 and UG-072301 (consolidated)
Petition for Approval of Extending SQI SAIDI Temporary Mechanics**

Dear Mr. Danner:

In accordance with WAC 480-07-370(b), enclosed for filing are the original and 12 copies of Puget Sound Energy, Inc.'s ("PSE's") Petition for Extending SQI SAIDI Temporary Mechanics ("Petition"). PSE is seeking the Commission's approval to extend and modify certain elements of Order 17 of consolidated Docket Nos. UE-072300 and UG-072301 ("Order 17") related to Service Quality Index ("SQI") No. 3 – System Average Interruption Duration Index ("SAIDI").

Specifically, in this filing, PSE is requesting to extend the effectiveness of the interim performance standard and calculations associated with PSE's SQI SAIDI for an additional year through 2014. The request stems from advancing the implementation of PSE's new electric geographic information system ("GIS") to coincide with the new outage management system ("OMS"). In Order 17, PSE committed to establish an operational OMS by October 1, 2012, and implementing a GIS by December 30, 2015. With the advance of the GIS schedule, PSE is targeting to have both operational GIS and OMS by July 1, 2013. The commitments outlined in this Petition reflect the schedule changes.

In anticipation of the new OMS, PSE also committed in Order 17 to file a petition to permanently amend the SQI SAIDI and other electric reliability related measurements by December 1, 2013, or SQI SAIDI will revert to the 2009 benchmark and performance calculation. However, in order to meet the December 1, 2013, target date established in Order 17, PSE would have to design its permanent electric reliability measurements without take advantage of its new GIS and OMS due the implementation schedule changes.

The one-year extension of SQI SAIDI Temporary Mechanics will allow PSE to collect sufficient data from its new OMS with accuracy supported by the new GIS. It also provide more time for PSE to work with the Commission Staff (the "Staff") and other interested

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parties in establishing permanent SQI electric service reliability measures that are based upon industry-accepted standards.

This filing is not a joint filing of the signatory parties of Partial Settlement Stipulation Re: Service Quality, Meter and Billing Performance, and Low-Income Bill Assistance, Appendix D to Order 12 of consolidated Docket Nos. UE-072300 and UG-072301. However, PSE has been working closely with the Commission Staff in submitting this petition. The other signatory parties of Appendix D to Order 12, Public Counsel and the Energy Project, have been notified of this filing.

The Company respectfully requests that the Commission issue an order regarding this petition no later than September 1, 2012. As described in the Petition, PSE may be able to take some actions to address the SQI SAIDI impact of the schedule changes in the implementation of GIS and OMS if PSE's Petition is not granted by the Commission. However, such actions are costly and do not seem to be the best interest of PSE customers.

Please contact Mei Cass at (425) 462-3800 for additional information about this filing. If you have any other questions please contact me at (425) 462-3495.

Very truly yours,



Tom DeBoer
Director - Federal & State Regulatory Affairs

Enclosure

cc: Sheree Carson, Perkins Coie
Service List for Docket Nos. UE-072300 and UG-072301