BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  PUGET SOUND ENERGY, INC.,  Respondent. | DOCKETS UE-072300 and UG-072301 (consolidated)  ANSWER OF COMMISSION STAFF IN SUPPORT OF PETITION FOR EXTENDING SQI SAIDI TEMPORARY MECHANICS |

1. On July 13, 2012, Puget Sound Energy, Inc. (“PSE” or the “Company”) filed a petition seeking approval of the Washington Utilities and Transportation Commission (“Commission”) to extend and modify certain elements of Order 17, issued November 29, 2010 in these dockets, related to Service Quality Index (“SQI”) No. 3 – System Average Interruption Duration Index (“SAIDI”). Staff supports the petition and recommends it be granted without hearing.
2. In Order 17, the Company committed both to establish an operational outage management system (“OMS”) by October 1, 2012 and to implement an electric geographic information system (“GIS”) by December 30, 2015. PSE also committed to request, by December 1, 2013, permanent amendments to the SQI SAIDI and other electric reliability measurements for the year 2014 and beyond. Interim benchmarks were established for the reporting periods 2010 through 2013.
3. In its current petition, the Company seeks to extend the effectiveness of the interim performance mechanics for SQI SAIDI for an additional year through 2014. This request stems from accelerating the implementation of the electric GIS to coincide with an operational OMS on July 1, 2013. The commitments outlined in PSE’s petition reflect these schedule changes.
4. Staff supports PSE’s petition because it will advance deployment of the electric GIS by over two years (from December 2015 to July 2013). Moreover, the one-year extension of the SQI SAIDI temporary mechanics will allow the Company to collect sufficient data from the new OMS with accuracy supported by the GIS. The extension will also allow PSE to work with Staff and other interested parties in setting permanent SQI electric service reliability measures based on industry accepted metrics.
5. Finally, PSE’s application requests amendment to Commission Order 17. WAC 480-07-875(1) states that the Commission may alter, amend, or rescind any order that it has entered,

after notice to the public service company or companies affected and to all parties in the underlying proceeding, and after allowing an opportunity for hearing as in the case of complaints.

The rule does not require a hearing. It only requires an opportunity for a hearing.[[1]](#footnote-1)

1. In Staff’s opinion, the issues raised by the Company’s petition can be decided on a paper record.[[2]](#footnote-2) Staff, therefore, does not request a hearing. Nor has PSE requested a hearing.
2. For the reasons stated above, the Commission should grant the Company’s petition without a hearing.

DATED this 19th day of July 2012.

Respectfully submitted,

ROBERT M. MCKENNA

Attorney General

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1. See also, RCW 80.04.210:

   The commission may at any time, upon notice to the public service company affected, and after opportunity to be heard as provided in the case of complaints rescind, alter or amend any order or rule made, issued or promulgated by it . . . [↑](#footnote-ref-1)
2. A paper record process was also used by the Commission in issuing prior Order 17. In that process, no other party commented on the prior petition. Any party that may comment on the current petition and argue that a hearing should be convened, should be required to show good cause that a hearing is justified. Absent such a showing, no hearing should be convened. [↑](#footnote-ref-2)