



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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January 17, 2025

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, Washington 98504-7250

RE: Compliance with Order 05 for missed SQI #11
Docket UE-220216

Dear Jeff Killip:

On March 29, 2022, Puget Sound Energy (PSE) filed a petition with the Washington Utilities and Transportation Commission (Commission) requesting mitigation relief and waiver of the \$613,636 penalty associated with PSE's overall 2021 Service Quality Index (SQI) No.11 – Electric Safety Response Time annual performance.

On October 26, 2023, the Commission entered Order 04 Denying Mitigation in the above-referenced docket. Order 04, denied PSE's request to mitigate the \$613,636 penalty for failing to meet the 55-minute average benchmark set in Service Quality Index (SQI) #11, Electric Safety Response Time.¹

On November 2, 2023, the Commission entered Order 05 Granting Clarification. Order 05, clarified that the penalty was to be added to the Company's funding of its energy assistance programs pursuant to the Service Quality Program Mechanics set forth in Exhibit PRM-4.²

On August 30, 2023, PSE filed with the Commission its annual filing for energy assistance program funding in UE-230694. The Company mistakenly used the penalty amount to lower the

¹ *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*, Dockets UE-220216, Order 04 Denying Mitigation, 43 (Oct. 26, 2023).

² *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*, Dockets UE-220216, Order 05 Granting Clarification, 2 (Nov. 2, 2023).

revenue requirement of its energy assistance program, in essence, refunding the penalty to customers which is not consistent with Order 05. The following year, on August 29, 2024, PSE submitted another annual energy assistance compliance filing in UE-240645. In UE-240645 PSE reversed the refund and added the \$613,636 penalty along with a few other penalties to its energy assistance program funding.

Commission Staff (Staff) reviewed the compliance filing provided by PSE dated August 30, 2023, and August 29, 2024, and finds that they contain sufficient detail with respect to treatment of the SQI #11 penalty outlined in Order 05. Therefore, Staff believes that the August 29, 2024, filing complies with the Commission's Order 05, entered November 2, 2024.

Sincerely,

Andrew Roberts
Regulatory Analyst