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Ms. Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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UTIL. AND TRANSP.
COMMISSION

Re: Relating to the Commission’s proceeding to develop a policy statement addressing alternatives to traditional cost of service rate making, Docket U-210590

Dear Ms. Maxwell:

Puget Sound Energy (“PSE”) provides the following comments to the Washington Utilities and Transportation Commission (“Commission”) in response to the Notice of Opportunity to File Written Comments (Notice) issued in Docket U-210590 on November 30, 2022.

PSE generally agrees that the performance metric mark-up provided in the Notice reflects an accurate depiction of the conversation during the Commission workshop on November 7, 2022. While PSE generally supports the direction of the metric calculations specified in the Notice, the following comments are offered on specific metrics in order to help define metric calculation methodologies that result in meaningful and accurate measures. Recommendations are provided in the following table; numbers and metric names correspond to the elements in the table contained in the Notice for consistency.

	Metric	PSE Comments
1	Equity in Reliability (SAIDI/CAIDI)for Named Communities and Non-Named Communities	PSE agrees with Avista’s comments regarding SAIDI and CAIDI as only appropriate for system metrics. SAIDI/SAIFI/CAIDI/CAIFI are fixed to a circuit for the metric. However, any given circuit may cross multiple named communities.

	Metric	PSE Comments
2	Equity in Reliability (SAIFI/CAIFI) for Named Communities and Non-Named Communities	See comments above.
10	Arrearages by month	Support using census tract or census block groups. Zip codes are not designed to aggregate data. In the technical sense they are a series of routes or lines. Census spatial units are designed for aggregating the socioeconomic/housing and other data sets used for vulnerability and the issues of concern. Metrics should use Census Block Groups rather than Census Tracts as Block Groups are the unit that have the American Community Survey data attached to them and they are a finer scale and thus offer more explanatory power than tracts do.
13	Average Energy Burden	Recommend deleting the word “average” in the metric name as the metric is actually focusing on median rather than averages. See above comments regarding recommendation to use census tracts or block groups. Consider also reframing based on “median energy burden <i>after</i> energy assistance.” This will ensure the measurement is actually measuring the effectiveness of energy assistance programs. PSE agrees that % or # of customers with high energy burden should be reported. Energy burden calculation should be the total of all fuel sources, not broken out by fuel.
14	Net benefits of DERs and GETs	Add a focus on customer benefits by adding the following language: “Net present value of <i>customer</i> benefits.”
15	DER utilization	PSE agrees with Avista’s recommendation to remove use of “cost-effective”.
20	Customers who participate in one or more bill assistance programs	More clarity is needed regarding the calculation of “vetted/estimate of total number of low-income customers that qualify for bill assistance.”
22	Supplier Diversity	The term “award” implies a Request For Proposal, which could miss actual dollars spent. Recommend removing “award” and using “Spend for Diverse suppliers as a percentage of total annual spend”. Veteran owned businesses should be included in the supplier diversity measure.
25	Equity in DER program enrollment	Add “distributed storage”. Also consider changing “enrolled” to “ <i>directly benefiting from</i> ”.
26	Equity in DER program spending	Add “distributed storage”

Thank you for the opportunity to provide performance metric recommendations. PSE looks forward to continuing progress on performance-based regulatory structures in Phase 2 of this docket. Please contact Wendy Gerlitz at (425) 462-3051 for additional information about these comments. If you have other questions contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

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