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November 26, 2014

Via Web Portal and Overnight Mail

Mr. Steven V. King
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 Through 2015**

Dear Mr. King:

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 ("Petition") for seeking an one-time extension of the current mechanics associated with PSE's Service Quality Index ("SQI") No. 3: System Average Interruption Duration Index ("SAIDI"). PSE respectfully requests that the Commission issue an order approving the temporary SQI SAIDI mechanics for the 2015 SQI reporting year.

After examining the outages that have been recorded and tracked in PSE's newly implemented Outage Management System ("OMS"), PSE realizes that at least one additional year of outage data is necessary in designing permanent SQI SAIDI mechanics to replace the current temporary mechanics. The additional data is required to adequately assess the effect of improving outage reporting accuracy on PSE's electric service reliability statistics. It also provides further insight in designing an unbiased electric reliability measurement in the new automated OMS environment. The extension of the current SQI SAIDI mechanics allows PSE to work with the Commission staff ("Staff") and other stakeholders in establishing permanent SQI electric service reliability measures that are based upon both PSE's OMS experience and industry-accepted standards.

The SQI SAIDI mechanics were set forth in Order 17 of Docket Nos. UE-072300 and UG-072301 (consolidated) to replace the previous SQI No. 3 benchmark and performance calculation that no longer adequately measured PSE's overall system reliability and customer satisfaction. The mechanics were developed after working closely with the Staff for about one and half years. The SQI SAIDI mechanics are temporary because of PSE's plans to implement an OMS system. Through the experience of other utilities, PSE anticipated an effect from the implementation of the OMS and the electric geographic information system ("GIS") on its electric service reliability

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statistics. However, the magnitude of the effect of the OMS and GIS implementation on reliability statistics for either immediate term or long term remains less foreseeable.

In its October 21, 2010 and July 13, 2012 petitions to the Commission, PSE outlined some of these potential effects and made specific commitments to address these electric service reliability and data concerns. The Petition provides an update of these commitments and demonstrates that PSE has sustained its electric service reliability performance since 2010 and continued its investments in reliability-related plant and practices to uphold customer electric service experience.

PSE respectfully requests that the Commission issue an order regarding this petition no later than December 31, 2014, before the beginning of the 2015 SQI reporting year, to determine the SQI SAIDI mechanics for 2015.

If you have any questions regarding the information in this filing, please contact Mei Cass at (425) 465-3800. If you have any other questions, please contact me at (425) 456-2110.

Sincerely,



Ken Johnson
Director, State Regulatory Affairs

Enclosure

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