

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 009

PUBLIC COUNSEL DATA REQUEST NO. 009:

Re: Direct Testimony of Booga K. Gilbertson, Exhibit No. BKG-1T.

What level of annual growth in tree and vegetation outages would Puget Sound Energy find acceptable?

Response:

Puget Sound Energy (“PSE”) offers a plan as described in the Prefiled Direct Testimony of Booga K. Gilbertson, Exhibit No. ____ (BKG-1T), at pages 32-34, and in the Prefiled Direct Testimony of Catherine A. Koch, Exhibit No. ____ (CAK-1CT) and Exhibit No. ____ (CAK-3C), to address outages that are trending upwards. From year to year the number of outages may change, but PSE believes that a sustained upward trend in outages is unacceptable and contributes to PSE’s lagging performance in comparison to its peers as provided in Figure 4 (BKG-1T, page 30).

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 010

PUBLIC COUNSEL DATA REQUEST NO. 010:

Re: Direct Testimony of Booga K. Gilbertson, Exhibit No. BKG-1T.

What level of increase in power outages caused by underground cable failure would Puget Sound Energy find acceptable?

Response:

Puget Sound Energy (“PSE”) offers a plan as described in the Prefiled Direct testimony of Booga K. Gilbertson, Exhibit No. ____ (BKG-1T), at pages 32-34, and in the Prefiled Direct Testimony of Catherine A. Koch, Exhibit No. ____ (CAK-1CT) and Exhibit No. ____ (CAK-3C), to address outages that are trending upwards. From year to year the number of outages may change, but PSE believes that a sustained upward trend is unacceptable and contributes to PSE’s lagging performance in comparison to its peers as provided in Figure 4 (BKG-1T, page 30).

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 042

PUBLIC COUNSEL DATA REQUEST NO. 042:

Re: Direct Testimony of Catherine A. Koch, Exhibit No. CAK-1CT.

Please explain the increase in tree and vegetation outages that Puget Sound Energy would find acceptable compared to the percentage increase in such outages identified by Ms. Koch.

Response:

Please see Puget Sound Energy's Response to Public Counsel Data Request No. 009.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 043

PUBLIC COUNSEL DATA REQUEST NO. 043:

Re: Direct Testimony of Catherine A. Koch, Exhibit No. CAK-1CT.

Please explain the increase in underground cable failures that Puget Sound Energy would find acceptable compared to the percentage increase in such outages identified by Ms. Koch.

Response:

Please see Puget Sound Energy's Response to Public Counsel Data Request No. 010.