

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DOCKET Nos. UE-072300 and  
UG-072301 (consolidated)

ANSWER OF COMMISSION STAFF  
IN SUPPORT OF PETITION FOR  
EXTENDING SQI SAIDI  
TEMPORARY MECHANICS

1 On December 1, 2014, 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 On July 13, 2012, the Company petitioned to extend the effectiveness of the interim performance mechanics for SQI SAIDI for an additional year through 2014. This request stemmed 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 reflected these schedule changes. The petition was unopposed by the parties to the proceeding.

4           Staff in particular supported PSE's petition. Staff reasoned that the petition would 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 would allow the Company to collect sufficient data from the new OMS with accuracy supported by the GIS. The extension would 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           The Commission, after reviewing PSE's unopposed petition and Staff's response in support, and after giving due consideration to all relevant matters and for good cause shown, found the petition to be in the public interest and so granted it as filed.

6           In its current petition, the Company seeks to extend the effectiveness of the interim performance mechanics for SQI SAIDI for an additional year, through 2015. The petition explains that 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.

7           Staff again supports PSE's petition because it will allow the Company to collect sufficient data from the new OMS with accuracy supported by the GIS. The extension of the current SQI SAIDI mechanics will also allow PSE to work with the 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.

8           Finally, PSE's application requests amendment to Commission Order 17. WAC 480-07-875(1) states: "The [C]ommission 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.<sup>1</sup>

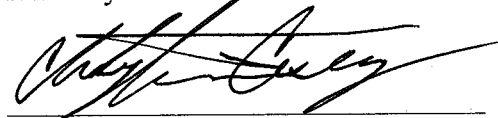
9           In Staff's opinion, the issues raised by the Company's petition can be decided on a paper record.<sup>2</sup> Staff, therefore, does not request a hearing. Nor has PSE requested a hearing.

10           For the reasons stated above, the Commission should grant the Company's petition without a hearing.

DATED this 9<sup>th</sup> day of December, 2014.

Respectfully submitted,

ROBERT W. FERGUSON  
Attorney General



CHRISTOPHER CASEY  
Assistant Attorney General  
Counsel for Washington Utilities and  
Transportation Commission Staff

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<sup>1</sup> 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 . . ."

<sup>2</sup> 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.