

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKETS UE-220066, UG-220067, and UG-210918 (*Consolidated*)

**SHAY BAUMAN
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT SB-2

Puget Sound Energy Response to Public Counsel Data Request No. 314

July 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-220066 & UG-220067
Puget Sound Energy
2022 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 314:

REQUESTED BY: Paul Alvarez

Advanced Metering Infrastructure (AMI)

Re: Advanced Metering Infrastructure. Sanem Sergici, Exh. SIS-3, AMI Report.

Page 23 of the AMI Report states, “As the company further develops and pursues these programs, it may acquire new data and insight that will help inform and further shape design and implementation. ... To address these uncertainties, at least in part, we constructed three cases, Low, Base, and High for each major quantified benefit.” Has Puget Sound Energy gathered any further data regarding the costs and benefits presented in its original business case? If so, why were those calculations not modified, and instead the costs and benefits presented in this Docket are incremental to the exact numbers previously presented?

Response:

The purpose of the AMI report, as noted on page 11 of the Second Exhibit to the Prefiled Direct Testimony of Sanem I. Sergici, Exh. SIS-3, was to support Puget Sound Energy’s demonstration of the customer-facing benefits of Advanced Metering Infrastructure (“AMI”) beyond the quantified benefits in the original business case to which the referenced statement is relevant.

Relative to the costs and benefits in the original business case, costs discussed on page 4 of the Sixth Exhibit to the Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-7, were within a reasonable range of the original business case and therefore no material modification to these costs was necessary. Please see Exh. CAK-7, pages 18-24, that discusses the three primary benefits that are being realized from the original business case based on current data.