

**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-3

Puget Sound Energy Response to Public Counsel Data Request No. 313

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. 313:

REQUESTED BY: Paul Alvarez

Advanced Metering Infrastructure (AMI)

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

Did Brattle examine the costs and benefits of Puget Sound Energy's previous AMI business case, to which the costs and benefits of this business case are incremental? If yes, please provide the extent of the analysis performed and indicate whether Brattle supports the calculations made in the original business case.

Response:

As discussed in the Prefiled Direct Testimony of Sanem I. Sergici, Exh. SIS-1T, pages 8-9, and in the Second Exhibit, Exh. SIS-3, page 6, the Brattle report was developed in response to the Commission's request that Puget Sound Energy ("PSE") demonstrate the customer-facing benefits of its AMI investments. The Brattle team reviewed the general benefit-cost framework and the results of PSE's previous AMI business case. Because the Commission accepted PSE's business case and found the operational decision to install AMI was prudent,¹ a full review of the analysis and calculations that PSE made in the original business case was not in the scope of the Brattle report.

¹ See Dockets UE-190530 and UG-190531, Order No. 08 ¶ 153.