

**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-4

Puget Sound Energy Response to Public Counsel Data Request No. 318

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. 318:**

REQUESTED BY: Paul Alvarez

Advanced Metering Infrastructure (AMI)**Re: Advanced Metering Infrastructure. Sanem Sergici Workpaper, New-PSE-WP-SIS-BEHAVIOR, HighUsageAlert tab.**

Sources and Notes [B] states that Puget Sound Energy is the source used for the assumptions that 52 percent of the customers who receive the high usage notification alert will open them. Of these, 1/3 will take action in the low case, 1/2 in the base case, and 2/3 in the high case.

- a. Please explain, in detail, the calculations, analyses, and assumptions that led PSE to determine 52 percent of the customers that receive usage notification alerts will open them. Provide supporting documentation and data, if applicable.
- b. Please explain, in detail, the calculations, analyses, and assumptions that of the 52 percent of eligible customers to receive high usage alerts, 1/3 will take action in the low case, 1/2 in the base case, and 2/3 in the high case. Provide these calculations, analyses, and assumptions separately for the low, base, and high case.

Response:

- a. The assumption is based on Puget Sound Energy's ("PSE") alert dispatch data for the twelve months prior to the date of analysis. The information is contained in Attachment A to PSE's Response to Public Counsel Data Request No. 317 which is an MS Excel spreadsheet that contains PSE's unusual usage alert data. The 52 percent open rate can be found in cell B15 in the "Engagement stats" worksheet.
- b. Once the percent of customers who will open the high usage alerts was determined, the next step was to determine the percentage of customers that will respond to this informational feedback. Since PSE did not have data on the latter, Dr. Sergici has relied on her expert judgement to develop low, base and high cases.