



December 30, 2022

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

*Re: Docket U-210590, Notice of Opportunity to Comment on Commission proceeding to develop a policy statement addressing alternatives to traditional cost of service ratemaking (Phase 1 – Performance Metrics), Comments regarding Draft Metrics*

Dear Ms. Maxwell:

The NW Energy Coalition (NWECE) appreciates the opportunity to respond to how to incorporate feedback from the October 2022 workshop into the draft performance metrics proposed by Utilities and Transportation Commission's (UTC or Commission) staff. Generally, the feedback captured in the meeting summary and in the table of draft metric seems accurate based on workshop feedback. Below, we provide some comments related to how the Commission might incorporate that feedback into revising the metrics. We do not address every metric.

- 1. Equity in Reliability (SAIDI and CAIDI) for Named Communities and Non-named communities**
- 2. Equity in Reliability (SAIFI and CAIFI) for Named Communities and Non-named communities**
- 3. Equity in Reliability: length of power outages**
  - During the workshop, for #1 and #2, we heard some feedback that momentary outages (less than 5 minutes) were also impactful for residential and commercial customers. A shorter cutoff in the metric (e.g., 3 minutes) could capture at least some of these shorter outages, or see the discussion below on metrics #8 and #9.
  - There is a question of whether it should be inclusive of major event days; with climate change, we will have likely more extreme weather days – that is, extreme becomes more the normal and will increase over time. We do not recommend separating major event days out of these metrics, but if they are, both metrics should be reported.
- 7. Equity in Resilience Investments**
  - While we support in principle this metric, without more information on the process by which resilience projects would be proposed to the Commission, it is challenging to comment on this metric in specific.
  - If something like this metric moves forward, we recommend to move to percentage of spending versus percentage of projects as indicated in the edits. Spending likely better

matches up with the impact to a community. With more definition around what “resilience” means, there may be a different metric (e.g., related to reliability metrics) that could also be measured here.

**8. Customers Experiencing Multiple Interruptions (CEMI) for Named and Non-Named Communities**

**9. Customer Experiencing Long Duration Outages (CELID) for Named and Non-Named Communities**

- We support these customer-centric metrics in addition to the normally reported system average metrics for reliability.
- For #8, a range of values could be fine as long as it is clear to stakeholders what the values mean in terms of customer impacts (e.g., how long are the outages that are being measured, what is “multiple”)
- For #9, we know there are some customers who are without power for many days following major events – while most are likely in the “few hours” timeframe, a value that captures these very impactful long duration outages is needed (e.g., “CELID-24” and “CELID-48” for outages lasting more than 24 and 48 hours respectively).
- Related to the discussion in #1 and #2, there could be a metric related to momentary interruptions here, e.g., Customers Experiencing Multiple Momentaries (CEMM) or Customers Experiencing Multiple Sustained and Momentary Interruptions (CEMSMI) could be metrics to explore to understand customer impacts.<sup>1</sup>

**10. Arrearages by Month**

**11. Percentage of Customers in Arrears with Arrearage Management Plans**

**12. Customer Disconnections and Reconnections**

**13. Average Energy Burden**

- We agree that data on these metrics should be reported by census tract, as available, and by zip code when census tract-level information is not available.
- For #12, reporting on both the total number and the percentage of customers who have been disconnected seems important information for stakeholders to have.
- As suggested in the edits for #13, a separate metric on the percentage of customers experiencing high energy burden seems important in addition to the average energy burden metric. Laws like CETA are pushing for more programs and policies to address energy burden; stakeholders should be able to easily understand how many customers are not experiencing manageable energy burdens.

**14. Net Benefits of DERs and GETs**

**15. DER Utilization**

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<sup>1</sup> For more information, see this paper from S&C Electric Company, “Moving Beyond Average Reliability Metrics” <https://www.sandc.com/globalassets/sac-electric/documents/public---documents/documents---all-documents/technical-paper-100-t128.pdf?dt=638071739286510557>

- #14 seems to need a fair amount of definition, which could be informed by the separate proceeding, UE-210804
- We think the revised definition for #15 (“Energy and capacity of all applicable DERs and percentage of that energy and capacity utilized annually”) is sufficient for capturing the feedback. The short title of the measure could be revised to “DER Availability and Utilization”.

#### **16. Percent of Utility Assistance Funds Dispersed**

- The suggested changes to the calculation in the table to focus on dispersal of customer assistance funds year over year. seem like appropriate changes to make.

#### **17. Incremental Cost**

- The short title of this metric should be revised so that a customer or stakeholder can better understand what this metric indicates.
- For gas utilities, the metric calculation indicates that there will be some sort of proceeding that establishes what the lowest reasonable cost is for complying with the CCA. Would this be through the gas IRP process or some other process wherein stakeholders can weigh in on these assumptions?

#### **22. Supplier Diversity**

- As noted in our previous comments, we agree with reporting on this metric, but also suggest that it include percentage of dollars awarded to these firms, for a more complete metric.

#### **24. Percentage of Non-pipeline and Non-wires Alternative Spending**

- We think some indication of the piped or wired projects deferred would be a good addition to this metric.

#### **25. Equity in DER Program Enrollment**

#### **26. Equity in DER Program Spending**

- For #25, we think that adding information on who is eligible could be useful. However, depending on how granular this measure is (e.g., portfolio versus specific measure), this could become somewhat unwieldy to report and review.
- We agree that there may be cases where gas and electric programs need specific definitions.

#### **27. Energy-related Air Quality Emissions**

- Reporting on this metric should include all generation sources used to serve load, rather than only those emissions that are generated within the utility’s service territory.

#### **29. Utility Load Management Success**

- The changes suggested in the table make sense to us.

### **30. DER GHG Reductions**

- Similar to #25, the granularity of this metric could make it challenging to report and review if it goes down to the measure level. Keeping this at the level of “energy efficiency program” or “residential energy efficiency program” versus “residential energy efficiency HVAC program” may be the best level.

### **32. Total Greenhouse Gas Emissions**

- We agree with the suggestions here regarding adding in market purchases, PPA purchases, and upstream impacts of gas usage.

Thank you for the opportunity to comment.

Best,

/s/

Amy Wheelless  
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NW Energy Coalition