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**Exh. DJR-4
Dockets UE-220066 and UG-220067,
UG-210918
Witness: Deborah J. Reynolds**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-220066, UG-220067,
UG-210918 (consolidated)**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For an Order Authorizing Deferred
Accounting Treatment for Puget Sound
Energy's Share of Costs Associated with
the Tacoma LNG Facility**

EXHIBIT TO TESTIMONY OF

DEBORAH J. REYNOLDS

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to UTC Staff Data Request No. 290

July 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

DATA REQUEST DIRECTED TO: John Piliaris
REQUESTED BY: Kathi Scanlan

UTC STAFF DATA REQUEST NO. 290:
Re: Performance Measures and Incentive Mechanisms

Background

In Docket U-210151, Inquiry into Reducing the Administrative Burden in Support of the Commission's Ongoing Inquiry into the Adequacy of the Current Regulatory Framework, on March 15, 2021, the Commission issued a Notice of Opportunity to File Written Comments, in which it requested that utilities "provide information regarding recurring filings that are required by statute, rule, or Commission order" and asked each utility to complete a "Utility Filings template," attached to the notice, "so the Commission is better able to compile a comprehensive listing of required filings." PSE filed comments on April 9, 2021, in the form of the Commission's template.

Attached to this data request is Attachment 1, a spreadsheet titled, "List of PSE's Recurring Regulatory Filings." The spreadsheet is a simplified representation of PSE's comment filing of April 9, 2021, in Docket U-210151.

Request

Please refer generally to the Prefiled Direct Testimony of Jon Piliaris, JAP-1T, Part VI., "the removal or modification of certain outdated reporting requirements for PSE is in the public interest," at pages 62 through 79. Please also refer to Attachment 1 to answer the questions below regarding streamlining PSE's current, status quo reporting requirements. Please provide answers in the Excel Spreadsheet for each filing in the column specified below.

- a. Column I—If the docket number has changed in column E, please update.
- b. Column J—With reference to RCW 80.28.425, is the content of the PSE filing identified in column B relevant to an identified key or specific performance area? If yes, should the existing filing be used for reporting in a specific performance area? Please explain.

- c. Column K—Does this filing support performance measures, incentives, or penalty mechanisms as outlined in RCW 80.28.425(7)? If yes, please identify and explain.
- d. Column L— After filing PSE's multiyear rate plan, has PSE's recommended position changed about filing frequency, as outlined in comments filed by PSE in Docket U-210151 on April 9, 2021? If yes, please (1) indicate the changes in recommended position about frequency, including change frequency, combine with another requirement, other, or remove, and (2) provide rationale regarding change in filing disposition.
- e. Column M—Please provide an estimate of hours, or actual hours if available, to prepare filing in Column B. Please specify estimated or actual and quantify hours.
- f. Column N— Please provide an estimated cost, or actual cost if available, to prepare filing in Column B. Please specify estimated or actual and quantify cost in dollars (\$).

Response:

Attached as Attachment A to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 290 are edits to WUTC Staff's Attachment 1.

- a. Column I - PSE has updated one docket number in Column I. There are no other changes.
- b. Column J - PSE objects to WUTC Staff Data Request No. 290(b) as overly broad and unduly burdensome to the extent that it requires PSE to speculate as to how nearly 80 filings may have any relevance to "performance areas" within RCW 80.28.425. Moreover, this statute does not require measures for every "performance area." As noted below, PSE has proposed a set of measures to comply with this statute. Finally, all of the reports in Attachment 1 are publicly available, identified and already reviewed by WUTC Staff who can make their own judgment regarding the extent to which these reports would serve the purposes intended in this request. Without waiving such objection, and subject thereto, PSE responds as follows:

Metrics and performance incentive mechanisms ("PIMs") are increasingly popular tools in performance-based ratemaking and are a common feature of multiyear rate plans. To inform the regulator and stakeholders on a utility's activities during the plan, some plans include a publicly-available scorecard with results for a shortlist of the most important metrics. Dr. Mark N. Lowry provided details of PSE's proposed scorecard in his Prefiled Direct Testimony, Exh. MNL-1T. This scorecard would use data from several of PSE's routine submissions to the Commission, as detailed elsewhere in this response. In its decision in this proceeding, the Commission may wish to

order the submission of a periodically-updated scorecard as proposed by PSE or with modifications.

PSE has proposed a “scorecard” of measures detailed in Exh. MNL-1T, p. 23, and in the Third Exhibit to the Prefiled Direct Testimony of Dr. Mark N. Lowry, Exh. MNL-4. PSE has updated Column J to indicate reports that contain data relevant to the metrics proposed by PSE in this case as presented in these exhibits. PSE takes no position at this time on whether those reports should be used for reporting in a specific performance area.

- c. Column K - Please see subpart b above.
- d. Column L - PSE does not propose any changes to its comments in Docket U-210151.
- e. Column M - PSE has no meaningful way of providing the requested information, as it does not track the time of employees at the level necessary to provide such hour estimates. As such, estimated or actual hours required to prepare these filings are not available.
- f. Column N - PSE has no meaningful way of providing the requested information, as it does not track the time of employees at the level necessary to provide such cost estimates. As such, estimated and actual costs required to prepare these filings are not available.

ATTACHMENT 1 to PSE's Response to WUTC Staff Data Request No. 290

Puget Sound Energy

Filing Title	Brief description of information provided/purpose	If the docket number has changed in column E, please update it here:	With reference to RCW 80.28.425, is the content of the PSE filing identified in column B relevant to an identified key or specific performance area? If yes, should the existing filing be used for reporting in a specific performance area? Please explain.
Purchased gas adjustment	Monthly report of activity in account 191 (unrecovered gas purchase costs)		
Meter and Billing Performance Report	Annual report on PSE's performance under the revised Meter and Billing Performance Standards		
Actual [gas/electric] results for Washington operations	Actual results for Washington operations		
Bill Inserts [gas/electric]	Electronic or paper copies of all pamphlets, brochures, and bill inserts of regulated service information		

Puget Sound Energy

Filing Title	Brief description of information provided/purpose	If the docket number has changed in column E, please update it here:	With reference to RCW 80.28.425, is the content of the PSE filing identified in column B relevant to an identified key or specific performance area? If yes, should the existing filing be used for reporting in a specific performance area? Please explain.
Qualifying Storm Report	Qualifying Storm Loss Deferral Mechanism; more detailed report following qualifying storm event notice.		
Compliance Report for the TransAlta-Centralia Coal Transition Power Purchase Agreement	Includes certain generation information, financial assistance payments and FTE info		
Commission Basis Reports [gas/electric]	Depicts the gas operations of a gas/electric utility under normal temperature and power supply conditions during the reporting period		

Puget Sound Energy

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Essential Utilities Services Contracts Report [gas/electric]	When the annual value to a vendor exceeds one and one-half percent of total company sales to ultimate customers as reported in the utility's most recent FERC Form No. 2 (or combined Forms No. 1 and No. 2 for combined utilities), each gas/electric utility must report the total contracts with that vendor for essential utility services contract or contracts, along with anticipated associated charges		
Schedule 91 Purchases from Qualifying Facilities of Five Megawatts or Less	Purchases from Qualifying Facilities of Five Megawatts or Less, updating the estimated avoided costs for both energy and capacity.		
Schedule 120 [gas/electric] Conservation Cost Recovery Adjustment	Recovery of all expected conservation cost changes and amortization of deferred balances.		
Disconnection Reduction Report	For the purpose of analyzing and monitoring disconnection trends		

Puget Sound Energy

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SQI and Electric Reliability Report (SQI Annual Report)	Service Quality and Electric Reliability Report; Natural Gas Emergency Response Plans; Critical Infrastructure Security Report		This report contains data relevant to current SQI metrics discussed in the testimony of Dr. Lowry and proposed for use in this multiyear rateplan. Going forward, it would also include data for any new SQIs adopted by PSE, such as those new SQIs proposed in the testimony of Dr. Lowry: SAIFI Excluding IEEE-Defined Major Events Adjusted to Exclude Catastrophic Days; SAIFI for Highly Impacted Communities and Vulnerable Populations, All Outages, Single Year; SAIFI for Highly Impacted Communities and Vulnerable Populations Excluding IEEE-Defined Major Events (Adjusted to Exclude Catastrophic Days); SAIDI for Highly Impacted Communities and Vulnerable Populations, All Outages, Single Year; SAIDI for Highly Impacted Communities and Vulnerable Populations Excluding IEEE-Defined Major Events (Adjusted to Exclude Catastrophic Days);

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SQI Semi-Annual Report	SQI Semi Annual Report for six months ended June, SQI Semi Annual Service Provider Service Quality Report, SQI Gas Emergency Response Plans Report (for reporting period January - June)		<p>The Service Quality and Electric Reliability report contains customer satisfaction and engagement, and service reliability data relevant to current SQI metrics discussed in the testimony of Dr. Lowry and proposed for use in this multiyear rateplan. Going forward, it would also include data for any new SQIs adopted by PSE, such as those new SQIs proposed in the testimony of Dr. Lowry: SAIFI Excluding IEEE Defined Major Events Adjusted to Exclude Catastrophic Days; SAIFI for Highly Impacted Communities and Vulnerable Populations, All Outages, Single Year; SAIFI for Highly Impacted Communities and Vulnerable Populations Excluding IEEE-Defined Major Events (Adjusted to Exclude Catastrophic Days); SAIDI for Highly Impacted Communities and Vulnerable Populations, All Outages, Single Year; SAIDI for Highly Impacted Communities and Vulnerable Populations Excluding IEEE-Defined Major Events (Adjusted to Exclude Catastrophic Days);</p> <p>No--Nattural Gas Emergency Response Plans does not contain any performance metric or measurement</p>

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Integrated Resource Plan (IRP)	Analysis describing the mix of generating resources, conservation methods, technologies, and resources to integrate renewable resources and, where applicable, address overgeneration events, and efficiency resources that will meet current and projected needs at the lowest reasonable cost to the utility and its ratepayers that complies with the requirements specified in RCW 19.280.030(1)		
IRP Work Plan	Plan that includes advisory group input and outlines the content of the IRP and expectations for the subsequent two-year progress report		
Draft IRP	Plan that includes the preferred portfolio, Clean Energy Action Plan, and supporting analysis, and to the extent practicable, all scenarios, sensitivities, appendices, and attachments		
IRP Two Year Progress Report	Updates load forecast, demand-side resource assessment including a new conservation potential assessment; resource costs; and the portfolio analysis and preferred portfolio, and any other necessary updates		

Puget Sound Energy

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Clean Energy Implementation Plan (CEIP)	The CEIP describes the utility's plan for making progress toward meeting the clean energy transformation standards, and is informed by the utility's clean energy action plan.		The CEIP includes PSE's Customer Benefit Indicators and associated metrics, many of which include data that is relevant to the following PSE proposed metrics in this GRC: CO2e Emissions from Company-owned Electric Operations; Peak Load Management Savings; Annual Energy Efficiency Savings - Electric; Number of customers participating in electric energy efficiency programs who are from highly impacted communities and vulnerable populations .
Clean Energy Compliance Report	Unless otherwise ordered by the commission, each electric utility must file a clean energy compliance report with the commission by July 1, 2026, and at least every four years thereafter.		To the extent that the Clean Energy Compliance Reports contain information related to PSE's Customer Benefit Indicators and metrics, PSE anticipates that these reports may include information relevant to PSE performance metrics as proposed in this GRC.
Annual Clean Energy Progress Reports	On or before July 1st of each year beginning in 2023, other than in a year in which the utility files a clean energy compliance report, the utility must file with the commission, in the same docket as its most recently filed CEIP, an informational annual clean energy progress report regarding its progress in meeting its targets during the preceding year.		To the extent that the Annual Clean Energy Progress Reports contain information related to PSE's Customer Benefit Indicators and metrics, PSE anticipates that these reports may include information relevant to PSE performance metrics as proposed in this GRC.

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CEIP Participation Plan and Education	On or before May 1st of each odd-numbered year, the utility must file with the commission a plan that outlines its schedule, methods, and goals for public participation and education both during the development of its CEIP and throughout the implementation of the plan		
Biennial CEIP update	The CEIP update may be limited to the biennial conservation plan requirements under chapter 480-109 WAC and will include an explanation of how the update will modify targets in its CEIP. In addition to its proposed biennial conservation plan, the utility may file in the update other proposed changes to the CEIP as a result of the integrated resource plan progress report		To the extent that the Biennial CEIP Updates contain information related to PSE's Customer Benefit Indicators and metrics, PSE anticipates that these reports may include information relevant to PSE performance metrics as proposed in this GRC.
Schedule 83 Electricity Conservation Service	Update the budget amount to implement conservation initiatives in electric Schedule 83		
Annual Report Schedule 93 Voluntary Load Curtailment Rider	Annual Report Schedule 93 Voluntary Load Curtailment Rider		
Schedule 129 [gas/electric] Annual Low Income Cost Recovery Compliance Filing	Cost recovery compliance filing		

Puget Sound Energy

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Schedule 137 (Elec. only) REC Tracker	Temporary customer charge or credit		
Schedule 139 Liquidated Damages Accounting Petition	Potential obligation to seek additional approval from the Commission if the regulatory liability for liquidated damages granted in this petition is not fully passed back		
Schedule 140 [gas/electric]Property Tax Tracker	Implement changes to rates under the Property Tax Tracker; includes a mechanism to adjust rates both up and down to pass through the cost of property taxes consistent with what PSE pays		
Schedule 141X [gas/electric] Protected-Plus Excess Deferred Income Tax (EDIT) Reversals Rate Adjustment	Update Schedule 141X for the year's ARAM reversal and to true-up the prior period reversals with amounts actually refunded		
Schedule 142 [gas/electric]Revenue Decoupling Adjustment Mechanism	Implement changes to rates under the established Revenue Decoupling Adjustment Mechanism. Schedule 142 is a mechanism for adjusting rates, both up and down, for defined Decoupled customers		
Schedule 171 Optional Non-Communicating Meter Service Annual Status Report	Annual Report of its electric and natural gas Schedules 171 implementation status. Through January 2026.		

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Schedule 171 Optional Non-Communicating Meter Service Bi-Annual Status Report	Bi-Annual Report of its electric and natural gas Schedules 171 implementation status.		
Schedule 194 (Elec) Residential and Farm Credit	The purpose of this filing is to pass through the residential exchange benefits that PSE receives from the Bonneville Power Administration under agreements between PSE and BPA. The adjustment will change with little or no notice in response to any change in benefits arising from the Agreement or in Residential Load		
Deferred Environmental Remediation Detail Reports	Provides detail of environmental remediation deferrals		
Colstrip Annual Report on Decommissioning and Remediation	Updates related to the status of Colstrip, provide the most recent estimates for retirement dates, and the amount of decommissioning and remediation expenditures for the Colstrip units along with an update to the estimated future D&R costs		
PCA Compliance Filing	Annual report detailing the power costs included in the deferral calculation		
UTC Fees and FERC Form Reporting Form 1	Comprehensive financial and operating report submitted for Electric Rate regulation and financial audits		
UTC Fees and FERC Form Reporting Form 2	Comprehensive financial and operating report submitted for Natural Gas Rate regulation and financial audits		

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PCA Quarterly Report	Revises the Power Cost Rate in Schedule 95 in the Company's overall normalized power supply costs		
Securities Transactions Report (gas/electric)	Annual securities transaction report		
Low Income Program Outcome Annual Report	Program outcomes will be monitored and analyzed through an annual report the Company will submit to the Commission no later than May 31 st of each year...		

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Annual Conservation Plan	On or before November 15th of each even-numbered year, a utility must file with the commission, in the same docket as its current biennial conservation plan, an annual conservation plan containing any changes to program details and annual budget.		
Annual Conservation Report	An annual conservation report regarding its progress in meeting its conservation target during the preceding year		The Annual Conservation Report will contain data used in the Annual Energy Efficiency Savings Electric and Gas and the Reduced Energy Consumption from Voltage Reductions metrics proposed in Dr. Lowry's testimony.
Biennial Conservation Report	Report regarding the Company's progress in meeting its conservation target during the preceding two years.		The Biennial Conservation Report will contain data used in the Annual Energy Efficiency Savings Electric and Gas and the Reduced Energy Consumption from Voltage Reductions metrics proposed in Dr. Lowry's testimony.
Biennial Conservation Plan	Includes a request that the commission approve its ten-year conservation potential and biennial conservation target		
Biennial Conservation Report Notice to Customers	A utility must provide a summary of the biennial conservation report to its customers by bill insert or other suitable method within ninety days of the commission's final action on the report.		

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Renewable Portfolio Standard (RPS) Report for current target year	Details the resources the utility has acquired or contracted to acquire to meet its renewable resource obligation for the target year		
Final Renewable Portfolio Standard Report for Report filed two years prior	Within two years of submitting the Annual Renewable Portfolio Standard Report, a utility must submit a final renewable portfolio standard compliance report that lists the certificates that it retired in WREGIS for the target year		
RPS Notice to Customers	Each utility must provide a summary of its annual renewable portfolio standard report to its customers by bill insert or other suitable method.		
Energy and Emissions Intensity Metrics	Greenhouse gas content calculation and energy and emissions intensity metrics		This EEI report contains the data for the CO2e Emissions from Company-owned Electric Operations metric proposed in Dr. Lowry's testimony.
Pipe Replacement Program Plan	Analysis of pipe replacement priorities and cost recovery		
Schedule 149 Cost Recovery Mechanism related to Pipeline Replacement Program Plan	Any company electing a CRM will prepare and submit the information described in this section of the policy statement with its program plan		

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Schedule 149 Cost Recovery Mechanism First Update	The company will update the projected costs with actual investment incurred during May through July and revised costs estimates for August through October with its annual Purchased Gas Adjustment tariff filing.		
Schedule 149 Cost Recovery Mechanism Second Update	Once actual project cost data are available, a company will submit actual cost data through September and an updated estimate for October under the PGA docket for that year		
Notice of Voting Requirements Change	Commitment 23: PSE shall file a notice with the Commission and serve such notice on the parties to Docket U-180860, within thirty (30) days of any (i) change to the voting requirements in either the PSE Bylaws or Puget Holdings LLC Agreement or (ii) creation of an enforceable voting agreement among two or more members of Puget Holdings	U-210542	
SQI – Notice to Customers	At least once per year, PSE will report the annual results for each item in the SQI to all of its customers.		

Puget Sound Energy

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Notice verification and assistance [gas/electric]	Customer notice		
Posting of tariffs for public inspection and review [gas/electric]	Each gas/electric utility offering service under tariff must make available for public inspection and review all tariffs governing its provision of service		

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Publication of proposed tariff changes to increase charges or restrict access to services [gas/electric]	Each gas utility offering service under tariff must publish or provide electronically all proposed changes to its tariff for at least thirty days, as required by RCW 80.28.060		
Tariff schedules to be filed with commission—Public schedules	Every gas company, electrical company, wastewater company, and water company shall file with the commission and shall print and keep open to public inspection schedules in such form as the commission may prescribe, showing all rates and charges made, established or enforced, or to be charged or enforced, all forms of contract or agreement, all rules and regulations relating to rates, charges or service, used or to be used, and all general privileges and facilities granted or allowed by such gas company, electrical company, wastewater company, or water company		

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Tariff changes—Statutory notice—Exception—Waiver of provisions during state of emergency	Unless the commission otherwise orders, no change may be made in any rate or charge or in any form of contract or agreement or in any rule or regulation relating to any rate, charge or service, or in any general privilege or facility which shall have been filed and published by a gas company, electrical company, wastewater company, or water company in compliance with the requirements of RCW 80.28.050 except after thirty days' notice to the commission and publication for thirty days, which notice must plainly state the changes proposed to be made in the schedule then in force and the time when the change will go into effect and all proposed changes must be shown by printing, filing and publishing new schedules, or shall be plainly indicated upon the schedules in force at the time and kept open to public inspection.		
Annual fuel mix information	Each retail supplier shall provide to its existing and new retail electric customers its annual fuel mix information by generation category as required in RCW 19.29A.060		
Payment location closure	The utility must provide written or electronic notice to the commission's consumer affairs section at least thirty days prior to the closing of any business office, customer service center, or payment agency		

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Payment location closure	The utility must provide written or electronic notice to the commission's consumer affairs section at least thirty days prior to the closing of any business office, customer service center, or payment agency.		
Distributed Generation Annual Report	Report disclosing the amount of distributed generation interconnected to investor-owned utilities in the state of Washington		
Annual Proposed Purchased Gas Adjustment (PGA)	A PGA clause is an accounting and rate adjustment procedure that gas utilities use to recover actual gas costs. Gas utilities must file with the commission for recovery of expected gas cost changes and amortization of accumulated book balances.		
Annual Hedging Plan	Annual comprehensive hedging plans that demonstrate the integration of risk responsive strategies into the Companies' overall hedging framework		
Schedule 95A Production Tax Credit Tracker	The annual true-up and rate filing for electric Schedule 95A Federal Incentive Tracker which includes the pass back of Treasury Grants received for PSE's Wild Horse Expansion and Lower Snake River wind facilities over ten years.		

Puget Sound Energy

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Budget	Budgets, in a format selected by the reporting company, must show amounts needed for construction, operation and maintenance during the ensuing year.		
Electric line extension cost study information filing	PSE will file Electric Line Extension Costs Studies at a minimum every two years starting 2019. These studies will cover a 12-month period.		