

**Exh. HEN-9  
Dockets UE-220066, UG-220067,  
UG-210918  
Witness: Hanna E. Navarro**

**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**

**HANNA E. NAVARRO**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE Response to UTC Staff Data Request No. 157*

**July 28, 2022**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**WUTC STAFF DATA REQUEST NO. 157:**

REQUESTED BY: Molly Brewer

**Re: Capital Planning**

Regarding PSE's response to Staff data request 80, PSE states it will be developing a replacement for iDOT, as shown in Attachment G of PSE's Response to Staff data request 74. It further states that once the new software is in place, it will define benefits, determine benefit weighting, and develop necessary processes related to new values such as equity, named communities, carbon emissions, non-traditional solutions, and more. Please provide any documents including internal emails, presentations, and plans that show decisions, assessments, or work in progress regarding incorporating these new benefits.

**Response:**

There are several steps to improving Puget Sound Energy's ("PSE") benefit analysis and optimization processes that will incorporate new identified values: 1) gain an understanding of the benefit values that should be considered; 2) develop and implement a tool that can incorporate these benefit values; 3) define the stakeholder processes which inform the model parameters and help validate the expected tool results; and 4) define processes for collection, analysis, and consistent input. PSE provides the following in response to WUTC Staff Data Request No. 157.

Relative to step 1, PSE's delivery system planning team has been engaging and integrating into the cross functional processes where these new benefits are being defined. Through this process, PSE is building a greater understanding and perspective on new benefit values and how they can be incorporated into the delivery system planning process. Additionally, information and feedback from the current Equity Advisory Group ("EAG") has been shared through meetings regarding reliability and equity.

- Attached as Attachment A to PSE's Response to WUTC Staff Data Request No. 157 is PSE's recent update and improvement plan on the maturity of the delivery system planning process capabilities that integrate into many other processes including PSE's Integrated Resource Plan ("IRP") and Clean Energy Implementation Plan ("CEIP"). Active engagement in these processes

helps to inform how values such as named communities are defined and how customer benefit indicators should be considered.

- Attached as Attachment B to PSE's Response to WUTC Staff Data Request No. 157 is PSE's initial work plan for optimizing equity and developing broader processes.
- Attached as Attachment C to PSE's Response to WUTC Staff Data Request No. 157 is documentation of recent capability work to identify 2022 goals.
- Attached as Attachment D to PSE's Response to WUTC Staff Data Request No. 157 is documentation of initial work compared to the currently defined iDOT benefits and the customer benefit indicators in the CEIP.
- Attached as Attachment E to PSE's Response to WUTC Staff Data Request No. 157 are notes from a series of meetings discussing the future of delivery system planning including early discussions regarding benefits.
- Attached as Attachment F to PSE's Response to WUTC Staff Data Request No. 157 is an email discussing how wildfire benefits could roll into the optimization process.
- Attached as Attachment G to PSE's Response to WUTC Staff Data Request No. 157 is documentation of the consideration of potential operational change impacts on methane reduction and the beginning planning for what this analysis might look like.
- Attached as Attachment H to PSE's Response to WUTC Staff Data Request No. 157 is a presentation PSE made to the WUTC sharing how non-wire alternatives and benefits may be considered in iDOT.
- Additionally, PSE's work to define System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI) metrics for named communities is discussed in PSE's Response to Public Counsel Data Request No. 160.

Relative to step 2, PSE's new tool project is progressing.

- Attached as Attachment I to PSE's Response to WUTC Staff Data Request No. 157 is the initial scope that has been defined for the new tool.
- Attached as Attachment J to PSE's Response to WUTC Staff Data Request No. 157 is the latest weekly status report from the iDOT replacement project

as the acquisition of a new tool that can incorporate new benefits is moving forward.

Relative to step 3, once the benefits can be added, PSE needs to consider how the benefits need to be weighted similar to the design of the current tool. This process still needs to be defined, but PSE envisions the opportunity to gather feedback from various stakeholders to incorporate a broad perspective on benefit weights.

- Attached as Attachment K to PSE's Response to WUTC Staff Data Request No. 157 is the introductory work towards a Delivery System Planning Technical Advisory Group charter.
- Attached as Attachment L to PSE's Response to WUTC Staff Data Request No. 157 is a presentation to the WUTC regarding stakeholder input.
- Attached as Attachment M to PSE's Response to WUTC Staff Data Request No. 157 is a meeting invite to initiate stakeholder engagement on the delivery system planning processes with the internal group that coordinated with the EAG and is supporting the IRP stakeholder process. With the conclusion of the first round of the EAG and the need to meet tight timelines, an internal discussion has begun again to consider greater integration in stakeholder groups such as the IRP and EAG. PSE's plan is to utilize these forums for input and tool validation.
- Attached as Attachment N to PSE's Response to WUTC Staff Data Request No. 157 is documentation of introductory thoughts for discussing iDOT and benefits in the upcoming IRP Advisory Group meeting.

Relative to step 4, data gathering, and analytical tools will be developed once the functional tool is designed. Actions like inputting non-wires alternatives into iDOT as highlighted in Attachment H provide an example of these implementation processes.

**ATTACHMENTS A–N to PSE’s Response  
to  
WUTC Staff Data Request No. 157**