



Puget Sound Energy
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UE-072300

UE-170033

March 29, 2022

Filed Via Web Portal

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

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03/29/22 08:40
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

**RE: PSE Service Quality Program and Electric Service Reliability Annual Filing
Dockets UE-170033 and UG-170034 (consolidated) and Dockets UE-072300 and
UG-072301 (consolidated) – Filed Electronically**

Dear Ms. Maxwell:

Pursuant to Order 08 of Dockets UE-170033 and UG-170034 (consolidated) and Order 29 of consolidated Dockets UE-072300 and UG-072301 and consistent with WAC 480-100-398 and WAC 480-07-140(5), Puget Sound Energy (“PSE”) provides the electronic version of PSE’s Service Quality Program and Electric Service Reliability Annual Filing for the twelve-month reporting period ending December 31, 2021.

This annual filing includes the following three reports:

- Attachment A: PSE 2021 Service Quality and Electric Service Reliability Report,
- Attachment B: PSE Natural Gas Emergency Response Plans for Outlying Areas, and
- Attachment C: PSE 2021 Critical Infrastructure Security Annual Report.

Attachment A, PSE 2021 Service Quality and Electric Service Reliability Report, details the Service Quality Indices (“SQI”) performance results for both PSE and its service providers and the electric service reliability results and analyses. In addition to the performance results, PSE also provides in Attachment A supplemental information on each service quality index including background and the actions PSE will be taking to improve performance.

For the 2021 service quality reporting year, PSE met six of its nine SQI performance benchmarks. PSE fell short of SQI #3-System Average Interruption Duration Index (“SAIDI”), SQI #4-System Average Interruption Frequency Index (“SAIFI”), and SQI #11- Electric Safety Response Time. The numerous unusual weather events throughout the year had caused so many more outages than prior years that severely affected the SQI performance for these three indices. The surge of these unplanned weather-related outages also increased the workload levels placed on the Electric First Response (“EFR”) workforce. This is on top of the EFR resource constraints/hiring difficulty resulting from the COVID-19 pandemic and the high cost of living in King County.

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Chapter 3 of Attachment A to this filing provides details about PSE's electric service reliability and in-depth analyses of the SQI #3 and SQI #4 SAIFI performance results. The SQI #11 section in Chapter 2 of Attachment A provides an overview of SQI #11- Electric Safety Response Time performance and discusses about the 2021 annual result. The penalty for not meeting SQI #4 is \$129,808. The potential penalty for SQI #11 is \$613,636, which may be reduced if the Commission grants PSE's penalty mitigation petition, which is filed concurrently with this filing. There is no SQI penalty associated with SQI #3 as the penalty mechanics is replaced by PSE's 24-Hour Restoration Service Guarantee where a \$50 credit is applied to customer accounts if they have experienced certain prolonged outages as prescribed in Schedule 131, Restoration Service Guarantee.

The electric service reliability section of Attachment A meets all the electric service reliability monitoring and reporting requirements in WAC 480-100-388, WAC 480-100-393, and WAC 480-100-398. The information in this section is also consistent with PSE's Electric Service Reliability Monitoring and Reporting Plan approved by the Washington Utilities and Transportation Commission ("Commission") in Docket UE-110060.

Appendix D of Attachment A presents PSE's proposed customer notice, Customer Service Performance Report Card, for the 2021 performance year. The Customer Service Performance Report Card is designed to inform customers of how well PSE delivers its services in key areas to its customers. After consultation with the staff of the Commission and the Public Counsel Unit of the Washington State Attorney General's Office, PSE will begin distributing the report card by June 30, 2022, as part of the customer-billing package.

Attachment B to this filing contains PSE's natural gas emergency response plans for the following outlying areas: Centralia/Chehalis, Kittitas County, Toledo, Vashon Island, Winlock, and Sumas Generating Station and Pipeline.

In accordance with WAC 480-07-160, PSE is requesting confidential treatment of Attachment B. Attachment B includes contact information for local emergency agencies and PSE employees and suppliers, detailed PSE facility information, and procedures for shutting down natural gas supply. PSE identifies that these local emergency agencies and PSE owners, customers, employees, and suppliers might be directly affected by disclosure of the confidential information.

Attachment C to this filing is PSE's 2021 Critical Infrastructure Security Annual Report. This report contains a description of PSE's cybersecurity and physical security policies and standard practices in 2021.

Please contact Mei Cass at (425) 462-3800 or Veronica Martin at (425) 457-5624 for additional information about this filing. If you have any other questions, please contact me at (425) 456-2142.

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Sincerely,

/s/ Jon Piliaris

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cc: Lisa Gafken, Public Counsel
Sheree Carson, Perkins Coie

Attachments:

Attachment A: 2021 Service Quality and Electric Service Reliability Report

Attachment B: Natural Gas Emergency Response Plans for Outlying Areas (Confidential)

Attachment B: Natural Gas Emergency Response Plans for Outlying Areas (Redacted)

Attachment C: 2021 Critical Infrastructure Security Annual Report