

**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*)

**ANDREA C. CRANE  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

---

**EXHIBIT ACC-8**

Puget Sound Energy Response to Public Counsel Data Request No. 127

**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. 127:**

**RE: Performance Measures and Incentive Mechanisms, Lowry Exh MNL-1T at 24:18.**

Regarding the discussion of SAIDI and SAIFI, in Exhibit MNL-1T, please explain the statement “[h]owever no targets are proposed for these metrics,” and state whether this absence of PSE targets applies only to highly impacted communities and vulnerable populations.

**Response:**

PSE proposes targets for systemwide reliability metrics except for those that pertain to all outages. The System Average Interruption Duration Index (“SAIDI”) and System Average Interruption Frequency Index (“SAIFI”) for all outages are difficult for a utility to control due to their sensitivity to severe storms, wildfires, and other volatile external events. Additionally, PSE proposes no targets for the SAIDI and SAIFI of electric service to highly impacted communities and vulnerable populations. These four metrics are new, and PSE has not identified reasonable targets for them. Two of these four metrics pertain to all outages.