

**EXH. AAA-3T  
DOCKETS UE-240004/UG-240005 et al.  
2024 PSE GENERAL RATE CASE  
WITNESS: AARON A. AUGUST**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-240004  
Docket UG-240005**

**In the Matter of the Petition of**

**PUGET SOUND ENERGY**

**For an Accounting Order Authorizing  
deferred accounting treatment of  
purchased power agreement expenses  
pursuant to RCW 80.28.410**

**Docket UE 230810  
(consolidated)**

**PREFILED REBUTTAL TESTIMONY (NONCONFIDENTIAL) OF**

**AARON A. AUGUST**

**ON BEHALF OF PUGET SOUND ENERGY**

**SEPTEMBER 18, 2024**

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1 **PUGET SOUND ENERGY**

2 **PREFILED DIRECT TESTIMONY (NONCONFIDENTIAL) OF**  
3 **AARON A. AUGUST**

4 **I. INTRODUCTION**

5 **Q. What topics are you covering in your rebuttal testimony?**

6 A. My rebuttal testimony responds to the recommendations made by Commission  
7 Staff witness Paul Koenig in his response testimony regarding PSE’s proposed  
8 Distributed Energy (“DER”), and Customer Satisfaction metrics. Ultimately, PSE  
9 withdraws its GRC metric proposals in favor of recommending that PSE report  
10 only on the metrics issued by the Commission in the policy statement for the  
11 duration of this rate plan.

12 **II. DISTRIBUTED ENERGY AND CUSTOMER SATISFACTION METRICS**

13 **A. DER Metrics**

14 **Q. What had PSE proposed with regard to DER metrics?**

15 A. PSE had proposed to alter the metric *Number of customers served by PSE’s DER*  
16 *Programs* by rolling up DER program participation into one total number of  
17 customers for all DER programs within a calendar year. In addition, PSE  
18 proposed to measure, *The capacity provided through each of PSE’s DER*  
19 *programs* thus modifying the originally proposed metric, to only report on  
20 capacity not energy, and to roll up each DER program to one total for all  
21 programs.

**Table 2. PSE’s Proposed DER Metrics for the Proposed Multiyear Rate Plan Period**

<b>Metric</b>	<b>Metric Definition</b>	<b>Revisions from 2022 GRC</b>	<b>Metric Calculation</b>
<b>Number of customers served by PSE’s DER programs.</b>	Annual number of customers served by PSE’s DER programs to date	Modify to roll up each DER programs to one total for all	Sum the total number of customers participating in DER programs at the end of the calendar year including net metering, solar, and battery programs only.
<b>The capacity provided through each of PSE’s DER programs.</b>	Annual nameplate capacity (MW) of PSE’s DER programs	Modify to only report on capacity not energy and roll up each DER program to one total for all	Sum of the total nameplate capacity (MW) at year end of all DER programs.

1

2

**Q. Did Staff Agree with any of PSE’s proposed DER metric revisions?**

3

A. Yes, Staff agrees with PSE’s proposal to change the second metric to *The capacity provided through each of PSE’s DER programs*, from *The energy provided through each of PSE’s DER programs*, and to only report on capacity, and not energy.

6

1 **Q. Did Staff disagree with any of PSE’s proposed DER metric revisions?**

2 A. Yes, Staff does not agree with PSE’s proposals to roll up totals for both *Number*  
3 *of customer served by PSE’s DER programs* and *The capacity provided through*  
4 *each of PSE’s DER programs* into one total number for all DER programs within  
5 a calendar year.

6 But, as mentioned above, PSE withdraws its metric proposals in favor of those in  
7 the Commission policy statement, which contain DER specific metrics.  
8 Additional DER metrics would be unnecessarily duplicative.

9 **B. Customer Satisfaction Metrics**

10 **Q. What changes had PSE’s proposed with regard to Customer Satisfaction**  
11 **metrics?**

12 A. PSE had proposed to alter the metric *Successful billing accuracy*, which measures  
13 the percentage of successful automated billing data received. This metric change  
14 was described in the Prefiled Direct Testimony of Roque B. Bamba, Exh. RBB-  
15 1T. PSE proposed to alter this metric by 1) removing the average monthly actuals  
16 for annual cumulative of all reads and 2) rolling up gas and electric reads to one  
17 total.<sup>1</sup>

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<sup>1</sup> Bamba, Exh. RBB-1T at 32-33; August, Exh. AAA-1T at 29.

1 **Q. Did Staff Agree with any of PSE’s proposed Customer Satisfaction metric**  
2 **revision?**

3 A. Yes, Staff agreed with PSE’s proposal to use annual cumulative numbers instead  
4 of average monthly actuals. Staff agrees with PSE’s assessment that this change  
5 will lead to more accurate accounting of network performance and allow PSE to  
6 better identify trends of concern around billing accuracy.

7 **Q. Did Staff disagree with any other aspects of PSE’s proposed Customer**  
8 **Satisfaction metric revision?**

9 A. Yes, Staff does not agree with PSE’s proposal to roll up gas and electric meter  
10 reads into one total for billing purposes.<sup>2</sup>

11 **Q. Did Staff respond to any other aspects of PSE’s Customer Satisfaction**  
12 **metrics?**

13 A. Yes, Staff indicated they had no concerns at this time regarding PSE's eventual  
14 proposed metric change to *SQI-5 Calls Answered by a Live Representative Within*  
15 *60 Seconds of Request*.<sup>3</sup> While PSE is not proposing the change in this rate case,  
16 we appreciate Staff’s support regarding this potential change in the future.

17 Similarly, Staff indicated that any future calculations for *SQI-10 Percent of*  
18 *Appointments Kept* include new construction. PSE did not put forward any  
19 proposed changes to this metric.

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<sup>2</sup> Koenig, Exh. PK-1T at 24.

<sup>3</sup> Koenig, Exh. PK-1T at 24.

1 **Q. How does PSE propose to address the matter of these particular**  
2 **performance metrics for the duration of the rate plan period associated with**  
3 **this case?**

4 A. For the reasons outlined in the Prefiled Rebuttal Testimony of PSE witness Matt  
5 Steuerwalt, Exh. MS-4T, with regard to the Commission issued Policy Statement  
6 Addressing Initial Reported Performance Metrics in Docket U-210590, PSE  
7 withdraws its GRC metric proposals in favor of recommending that PSE report  
8 only on the metrics issued by the Commission in the policy statement for the  
9 duration of this rate plan. Customer satisfaction metrics are included in the  
10 WUTC policy statement. Adding additional metrics beyond those in the policy  
11 statement is therefore unnecessary.

### 12 III. CONCLUSION

13 **Q. In summary, what is PSE's response to Staff's recommendations regarding**  
14 **the DER and Customer Satisfaction Metrics?**

15 A. PSE withdraws its GRC metric proposals and proposes that PSE report only on  
16 the metrics issued by the Commission in the recent policy statement for the  
17 duration of this rate plan.

18 **Q. Does that conclude your response testimony?**

19 A. Yes, it does.