

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET NOS. UE-190529 and UG-190530 (*Consolidated*)

PAUL J. ALVAREZ ON BEHALF OF PUBLIC COUNSEL UNIT

EXHIBIT PJA-6

Puget Sound Energy Response to Public Counsel Data Request No. 85

November 22, 2019

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 085:

Please refer to workbook “NEW-PSE-WP-CAK-4_AMIModel30 (C).xlsx”, tab “CVR TCO”.

- a. Many of the cells reference “CVR Analysis Updated 2013.xls”. Provide this worksheet.
- b. Cell V6 indicates that 164 substations will be upgraded with CVR by 2033. How many circuits are represented by these 164 substations?
- c. How many substations does PSE have?
- d. How many circuits does PSE have?
- e. Provide any analyses PSE may have completed which evaluates circuits and/or substations for priority CVR deployment based on loads, voltage variation, or other factors.
- f. Provide average annual voltage for each PSE circuit in 2018.

Response:

Puget Sound Energy (“PSE”) provides the following response to Public Counsel Data Request No. 085:

- a) Attached as Attachment A to PSE’s Response to Public Counsel Data Request No. 085 is the requested file. The file name (“CVR Analysis.xlsx”) has changed over time.
- b) There are about 629 circuits associated with the 164 substations.
- c) PSE has 283 distribution substations as of the date of this response.
- d) PSE has 1,118 distribution circuits as of the date of this response.
- e) Substations proposed for CVR candidates were chosen based on having 50 percent or greater mix of residential customers. Attached as Attachment B to PSE’s Response to Public Counsel Data Request No. 085 is the 2007 Northwest Energy Efficiency Alliance Distribution Efficiency Initiative report which is the basis for the CVR candidates. This initiative concluded that compact radial residential and commercial circuits with relatively high load density make the best

candidates for distribution efficiency methods to realize the maximum reduction in energy consumption. Attached as Attachment C to PSE's Response to Public Counsel Data Request No. 085 is an MS Excel spreadsheet which contains the data used to identify the 164 substations.

- f) Currently, PSE is only able to collect circuit voltage information at the substation level for all of its substations. Attached as Attachment D to PSE's Response to Public Counsel Data Request No. 085 is an MS Excel spreadsheet which includes the 2018 average substation voltage for all substations.

Note: As explained in PSE's Response to Public Counsel Data Request No. 075, the workpaper titled NEW-PSE-WP-CAK-4_AMIModel30 (C).xlsx has limited relevance to PSE's AMI Business Case in 2016 as it was only used for PSE's initial feasibility assessment to explore AMR management options in 2013.