

Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

March 29, 2022

Via Web Portal

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

Received
Records Management
03/29/22 14:46
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Petition for Service Quality Index No. 11 Penalty Mitigation

Dear Ms. Maxwell:

Enclosed for filing is Puget Sound Energy's ("PSE" or the "Company") petition for –penalty mitigation associated with the annual performance of Service Quality Index ("SQI") No. 11- Electric Safety Response Time ("SQI-11") for the annual period ending December 31, 2021. PSE's SQI-11 annual performance is due to unusual and exceptional circumstances that were outside of PSE's control. Moreover, PSE's level of preparedness and response has been reasonable, as demonstrated by the facts and discussions presented in the attached petition.

This petition is filed concurrently with PSE's annual filing of its Service Quality and Electric Service Reliability Report, which details PSE's 2021 service quality and reliability performance. PSE's SQI program mechanics¹ provides the following:

- In the annual report, the Company may include a mitigation petition for relief from penalty, if it believes, in good faith, that it meets the mitigation standard. The standard to be applied for such a petition is that the penalty is due to unusual or exceptional circumstances for which PSE's level of preparedness and response was reasonable. PSE will not file a mitigation petition unless it believes, in good faith, that it meets this mitigation standard. The parties contemplate that, following a procedure to be established by the Commission, a Commission order will be issued assessing any penalties and resolving any mitigation petition.²

¹ The updated Appendix 2 to Exhibit J to Dockets UE-011570 and UG-011571 (Consolidated) in Compliance with Order 25 of Dockets UE-072300 and UG 072301 (Consolidated)

² *Id.*

Ms. Amanda Maxwell

March 29, 2022

Page 2 of 2

PSE respectfully requests that the Commission issue an order regarding PSE's petition no later than April 30, 2022, thereby allowing PSE to incorporate the final SQI-11 penalty assessment into its Customer Service Performance Report Card ("Report Card"). As stipulated in PSE's SQI program mechanics, PSE will begin distributing its final Report Card as part of the customer billing package only after adequate consultation with the Commission staff and Public Counsel, but no later than 90 days after PSE files its annual Service Quality and Electric Service Reliability Report, i.e., by June 1, 2022, for the 2021 Report Card.

Please contact Mei Cass at (425) 462-3800 or mei.cass@pse.com for additional information about this filing. If you have any other questions please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

Jon Piliaris
Director, Regulatory Affairs
Puget Sound Energy
PO Box 97034, EST-07W
Bellevue, WA 98009-9734
(425) 456-2142
Jon.Piliaris@pse.com

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

Attachments:
PSE SQI-11 Petition
Certificate of Service