

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UE-240004 and UG-240005
(*Consolidated*)

CROSS EXHIBIT TAH-__X

Puget Sound Energy's Responses to
The Energy Project's Data Request 74

October 28, 2024

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-240004 & UG-240005
Puget Sound Energy
2024 General Rate Case**

THE ENERGY PROJECT DATA REQUEST NO. 074

Subject: Performance metrics
Reference: Exh. TAH-10T at 30-31; Exh. CLW-10T at 20-21

In rebuttal testimony, witnesses Huston and Wallace reject proposals from outside parties, including TEP, to track metrics that are not currently recommended by the Commission in the Policy Docket, including (1) DER program capacity in highly impacted communities and vulnerable populations, (2) average excess energy burden per household, (3) percentage of utility-owned and -supported EV support equipment in or benefitting highly impacted communities and vulnerable populations, (4) AMI bill read success rate, remote switch success rate, and reduced energy consumption from voltage regulation for highly impacted communities and vulnerable populations, (5) share of bill assistance customers in highly impacted communities and vulnerable populations, (6) number and percentage of residential disconnection notices, disconnections, and reconnections, by month, zip code, and demographics, and (7) residential arrearages by month, location, and demographics. PSE rejects many outside proposals on the basis that the data are reported in other filings or are otherwise unnecessary to report.

Please provide a table, similar to the table provided below, that states every metric proposed by an outside party that PSE rejects tracking, the location PSE otherwise discloses the data proposed in the rejected metrics, and a hyperlink to the public website where customers can view the most recent dataset.

Proposed Metric Rejected by PSE	Location PSE Currently Reports Data	Hyperlink public version of most recent dataset

First Revised Response:

	Proposed Metric Rejected by PSE	Location PSE Currently Reports Data	Hyperlink public version of most recent dataset
1.	The amount of PSE DER program capacity sited in areas of highly impacted communities and vulnerable populations	PSE reported on DER program capacity benefiting Named Communities in its 2023 Biennial Clean Energy Implementation Plan (CEIP) Update (in Table 3.5 in Chapter 3: Equity on page 3.22), filed on November 1, 2023 in Docket UE-210795. PSE’s CEIP and Biennial Update are also available on PSE’s Clean Energy Plan website.	https://www.utc.wa.gov/case/docket/2021/210795/docsets https://www.cleanenergyplan.pse.com/library → https://www.pse.com/-/media/PDFs/CEIP/2023/05/BU23_Ch3_Final.pdf
2.	Average excess energy burden per household, separately for electric and gas	<p>PSE files its Table 4 Metric, per Order 24/10 in Docket UE-220066 <i>et al.</i> on an annual basis (typically at the end of the 3rd quarter). Table 4 assesses the average energy burden of residential customers by service type (electric, gas, dual fuel) over time and by location. Results greater than 6 percent indicate energy burden concerns.</p> <p>Additionally, PSE tracks electric average excess energy burden per household for known low income customers and for customers in highly impacted communities and vulnerable populations as part of Customer Benefit Indicators in PSE’s CEIP. See the latest information in Appendix H “Customer Benefit Indicator Metrics” of the 2023 Biennial CEIP Update (filed on November 1, 2023 in Docket UE-210795, also available on PSE’s Clean Energy Plan website).</p>	<p>The most recent Table 4 Metrics was filed on September 26, 2024 in Docket UE-220066 <i>et. al.</i></p> https://www.utc.wa.gov/case/docket/2022/220066/docsets https://www.utc.wa.gov/case/docket/2021/210795/docsets https://www.cleanenergyplan.pse.com/library → https://www.pse.com/-/media/PDFs/CEIP/2023/18/BU23_H_Final.pdf

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3.	Percentage of utility-owned and supported EVSE by use case located within or intended to provide direct benefits and services to highly impacted communities and vulnerable populations	<p>PSE reported on this metric in its Multi-Year Rate Plan (MYRP) Compliance Filing on March 29, 2024, per the Revenue Requirement Settlement approved by the Commission in Order 24/10 in Docket UE-220066 <i>et. al.</i></p> <p>Additionally, PSE reports on this metric in PSE’s Transportation Electrification Plan – see Table 2 on page 7 of PSE’s latest 2024 Q3 Transportation Electrification Summary Report filed in Docket UE-210191 on September 30, 2024.</p> <p>PSE’s Transportation Electrification Plan is also available on PSE’s Transportation Electrification website.</p>	<p>https://www.utc.wa.gov/case/docket/2022/220066/docsets</p> <p>https://www.utc.wa.gov/case/docket/2021/210191/docsets</p> <p>https://www.pse.com/en/pages/electric-cars/transportation-electrification</p>
4.	AMI bill read success rate for highly impacted communities and vulnerable populations [electric and gas]	PSE reported on this metric in its MYRP Compliance Filing on March 29, 2024, per Commission Order 24/10 in Docket UE-220066 <i>et. al.</i>	https://www.utc.wa.gov/case/docket/2022/220066/docsets
5.	Share of bill assistance customers in highly impacted communities and vulnerable populations	PSE reported on this metric in its MYRP Compliance Filing on March 29, 2024, per Commission Order 24/10 in Docket UE-220066 <i>et. al.</i>	https://www.utc.wa.gov/case/docket/2022/220066/docsets

	Proposed Metric Rejected by PSE	Location PSE Currently Reports Data	Hyperlink public version of most recent dataset
6.	Number and percentage of residential disconnection notices, disconnections, and reconnections, by month, zip code, and demographics	<p>PSE reports this metric data on an annual basis in PSE’s Disconnection Reduction Plan, per Final Order 08 in Docket UE-190529 <i>et. al.</i> The latest Disconnection Reduction Plan was filed on July 8, 2024.</p> <p>PSE also reported on this metric in its MYRP Compliance Filing on March 29, 2024, per Commission Order 24/10 in Docket UE-220066 <i>et. al.</i></p>	<p>https://www.utc.wa.gov/case/docket/2019/190529/docsets</p> <p>https://www.utc.wa.gov/case/docket/2022/220066/docsets</p>
7.	Residential arrearages by month, location, and demographics	<p>PSE reported on this metric in its MYRP Compliance Filing on March 29, 2024, per Commission Order 24/10 in Docket UE-220066 <i>et. al.</i></p> <p>Further, PSE has been reporting residential arrearage data in the COVID Docket in U-200281. The latest data filed was on September 6, 2024.</p>	<p>https://www.utc.wa.gov/case/docket/2022/220066/docsets</p> <p>https://www.utc.wa.gov/case/docket/2020/200281/docsets</p>
8.	Remote switch success rate for highly impacted communities and vulnerable populations	PSE reported on this metric in its MYRP Compliance Filing on March 29, 2024, per Commission Order 24/10 in Docket UE-220066 <i>et. al.</i>	https://www.utc.wa.gov/case/docket/2022/220066/docsets
9.	Reduced energy consumption from voltage regulation for highly impacted communities and vulnerable population	See PSE’s Annual Conservation Report and Biennial Conservation Report (UE-210822): Conservation Voltage Regulation (CVR) metric is reported in Exhibit 1, under schedule 292: Electric Generation, Transmission and Distribution. This consists entirely of CVR projects.	<p>https://www.utc.wa.gov/case/docket/2021/210822/docsets</p> <p>Also at PSE’s website (2023 Annual Conservation Report): https://www.pse.com/-/media/Project/PSE/Portal/Rate-documents/EES/ees_2023_annual_rpt_energy_conservation_accomplishments.pdf?rev=c02bac34717f46bd97673a9c617f6ae4&sc_lang=en</p>

	Proposed Metric Rejected by PSE	Location PSE Currently Reports Data	Hyperlink public version of most recent dataset
10	Total Revenues associated with rider or similar cost recovery mechanisms	PSE does not currently report this.	
11	Average connection times for new service requests associated with new residential housing construction	PSE does not currently report this metric.	
12	Average annual net plant in service per customer, separately for gas and electric	PSE reported on this metric in its MYRP Metrics Compliance Filing on March 29, 2024, per Commission Order 24/10 in Docket UE-220066 et. al.	https://www.utc.wa.gov/case/docket/2022/220066/docsets
13	Number and percentage of households with a high-energy burden (>6%), separately identifying known low income and highly impacted communities and vulnerable populations, separately for gas and electric by census tract.	PSE reported on this metric in its MYRP Compliance Filing on March 29, 2024, per Commission Order 24/10 in Docket UE-220066 et. al.	https://www.utc.wa.gov/case/docket/2022/220066/docsets