



Puget Sound Energy
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Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

**Re: Dockets UE-220066, UG-220067, and UE-210918
Compliance Filings
Multi-Year Rate Plan Metrics (Table 4) – Second Supplemental
Multi-Year Rate Plan Annual Report (Attachment A) – Second Supplemental**

Dear Executive Director Maxwell:

In compliance Final Order 24/10 in Dockets UE-220066, UG-220067, and UE-210918 (Consolidated), Puget Sound Energy (“PSE”), hereby submits Second Supplemental Table 4 Metrics for the year 2022 (“Table 4 Metrics”) and the Second Supplemental Attachment A Metrics of the Multi-Year Rate Plan Annual Report (“Attachment A”), as explained more fully below.

I. BACKGROUND

a. First Supplemental Attachment A

On March 31, 2023, pursuant to paragraphs 237 and 243 of Final Order 24/10, PSE submitted its Multi-Year Rate Plan Annual Report (“Annual Report”). In the Annual Report, PSE committed to update Attachment A by June 15, 2023 to reflect 2022 data that was not available at the time of the filing. Specifically, PSE agreed to:¹

- (i) report highly impacted communities and vulnerable populations separately;
- (ii) report results of electric and gas service separately for metrics related to DER, demand side management, demand response and renewable energy;
- (iii) update metric #29 to reflect public charging ports owned by PSE, as well as third parties; and

¹ See *Puget Sound Energy, Compliance Filing, Multi-Year Plan Annual Report, Dockets UE-220066 et al.*, Attachment, Multi-Year Rate Plan Annual Report at pp. 10-11 (March 31, 2023).

- (iv) update all references to “vulnerable population” to reflect the final definitions approved by the Commission in PSE’s Clean Energy Implementation Plan proceeding in Docket UE-210795²;

On June 15, 2023, PSE updated Attachment A of the Annual Report to reflect items i-iii only (“First Supplemental Attachment A”). Due to the timing of the issuance of Final Order 08 (June 6, 2023) and the timing of filing First Supplement Attachment A (June 15, 2023), PSE was unable to incorporate the Commission’s guidance articulated in Final Order 08 into the calculations of the metrics in time to meet the June 15, 2023 filing deadline. Therefore, PSE committed to include the Commission’s guidance in its next Annual Report to be filed on March 31, 2024.

b. First Supplemental Table 4 Metrics

On February 3, 2023, in compliance with paragraph 111 of the Commission’s Final Order 24/10, PSE filed its Table 4 Metrics related to operational efficiency, company earnings, affordability, and energy burden for calendar years 2019-2022 (“February 3 Filing”).

With regards to operational efficiency and earning metrics, the February 3 Filing only included data for calendar years 2019, 2020, 2021 because 2022 data would not be available until after PSE issues its Form 10-K which was scheduled to be released on or about February 23, 2023. Therefore, PSE committed to make a subsequent filing shortly after the issuance of its Form 10-K. Accordingly, on April 14, 2023, PSE submitted its updated Table 4 Metrics to reflect 2022 calendar year results for the operational efficiency and earnings metrics (“First Supplemental Table 4”).

The February 3 Filing was also missing 2022 data for affordability and energy burden metrics because the billing data required to calculate these measures was coming from various internal and external sources and would not be available until the end of the second quarter. PSE agreed to provide this data in the third quarter.

II. INSTANT FILING

a. Second Supplemental Table 4 Metrics

Second Supplemental Table 4 included herein reflects 2022 calendar year data related specifically to affordability and energy burden metrics. As shown in Second Supplemental Table 4, tab “Affordability 1-PSE Territory”, the average annual bill impact in 2022 increased by \$22.29 (1.89 percent) for electricity and \$64.57 (7.5 percent) for gas.

b. Second Supplemental Attachment A

Second Supplemental Attachment A has been updated to reflect two revisions. First, PSE updated all metrics related to energy burden under Section 63 to reflect 2022 calendar year

² See *In the Matter of Puget Sound Energy*, Clean Energy Implementation Plan Pursuant to WAC 480-100-640, Final Order 08, Docket UE-210795 (issued June 6, 2023) (“Final Order 08”).

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data that became available in July 2023. Note, PSE is only providing the metrics that have been revised, rather than entire Attachment A metrics.

Additionally, Second Supplemental Attachment A corrects an error that resulted in undercounting the number of participants and savings from PSE's Energy Efficiency programs. Section 64, Advancing Equity in Utility Operations now reflects an accurate record of energy efficiency participation for 2022. (*See* Attachment 1 include herein for a description of the revisions to Sections 63 and 64 of Second Supplemental Attachment A).

If you have any questions regarding the filing, please contact me at (425) 456-2105.

Sincerely,

/s/ Susan E. Free

Susan E. Free

Director of Revenue Requirements and Regulatory Compliance

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Service List

Attachments:

Second Supplemental Table 4 Metrics - 2nd Supp MYRP Aff EB Metrics

Second Supplemental Attachment A – 2022 Annual MYRP Rpt 2nd Supp Attach A

Attachment 1 – Metrics Updated in Second Supplemental Attachment A – Customer Insights
Certificate of Service