PSE Responses to Established Metrics					
No.	**Metrics**	**Response – 1A Challenges/Clarity**	**Response – 1B Difficulty in Obtaining Data**	**Response – 1C Formats – Effective or Challenging**	**Response – 1D Standardized Templates**
1.	Average and median length (in minutes) of power outages per year, separately calculating Named and Non-named Communities reporting with and without major event days (MEDs).	PSE manages reliability data at the outage level rather than individual customer level, using a top-down aggregate approach. The Commission's requirement for calculations based on individual customers requires significant system modifications to our current Outage Management System (OMS) data flow processes. Benchmarking has revealed inconsistency among utilities in the types of outages included in reliability reporting following IEEE Stud 1366. Some utilities omit scheduled outages or impacts of safety measures such as public safety power shutoffs in their outage reporting. Clarification should be provided regarding exclusions to sustained outage determination. (Reference: Docket UE240004/UG-240005 Prefilled Testimony of David J. Landers, Edh. DJL-9, "Guide house Reliability Metrics Research")	PSE's current approach provides system-level precision and enables efficient calculations for SAIDI and SAIFI in compliance with IEEE Standard 1366. Moving to individual customer level duration tracking introduces the need to maintain an increased quantity of data points and greater effort to ensure data quality and accuracy. Manual data clean-up is often required during the outage review processes to correct impacts of temporary restorations, etc. and making these adjustments for each individual customer affected by the outage will require greater effort.	Current reliability reporting systems are optimized for system-level metrics rather than individual customer duration calculations. The challenge is developing a robust reporting process that merges the individual customer records affected by outages (for PSE that could be 2 – 3 million records each year) with the individual customer's Named Community designation.	N/A
2.	Natural Gas Emergency Response Time	Definition clarity: PSE tracks all emergencies calls from time of "call" to arrival of field technician per our SQI 7 metric. Is this PBR only focused on "customer calls" that are related to a system emergency at a customer home or business, or is it all emergencies? Not all our emergency calls are from customers and	Emergencies that are not associated with a particular customer premise can be a challenge to tie to named/non-named community per the above response.	Online portal submission is helpful	Guidance is always helpful

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		not all emergencies are at a customer location. Technical barriers: Since the total population of emergencies do not tick and tie to a customer, we are relying on technology to connect each emergency to a named or non-named community. We believe the current method is resulting in the "undetermined" category but also that PSE resources will be able to eliminate this outlier population.			
3.	The ten worst performing circuits in any given year separately by both frequency and duration, reported both with and without MEDs and identifying circuits that serve Named Communities. Also report the number of years over the past five years that a circuit has appeared on the list.	Given that individual circuits often serve both Named Communities and other customers, clarification is needed on the threshold percentage of Named Community customers served by a circuit for it to be classified as "serving Named Communities." PSE also requests clarification regarding phase-in of the new reporting expectations, specifically if this metric requires retroactive analysis to produce data based on parameters that were not in existence at the time of data collection. For example, without Named Communities having been defined during the full five-year historical period, some historical outage data may not be easily mapped to Named Communities. Where mapping is difficult or not possible, what assumptions should be made?	Metric 1 specifically designates outages with a duration of greater than five minutes are reportable. For Metric 3, are calculations for Worst Performing Circuits to include only outages with a duration of greater than five minutes for both frequency and duration reporting?	N/A	N/A

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4.	Average number of outages for customers experiencing multiple interruptions (grouped by those experiencing 1-4 interruptions, 5-8 interruptions, and more than nine interruptions)	There appears to be a discrepancy in the metric definition asking for average number of outages for customers. The metric calculation details imply a percentage based upon customer totals in each bin. Should the metric language "Average number of outages for customers experiencing multiple interruptions" be re-phrased to "Customers Experience Multiple Interruptions" for the metric calculation to be correct? Additionally, PSE requests clarification on why this metric excludes Major Event Days (MEDs) when other reliability metrics include both MED and non-MED reporting, as this limitation creates inconsistency across the reliability metric framework and may not provide a complete picture of customer interruption experiences. Finally, PSE assumes that customers experiencing nine and above interruptions should be included in the "more than nine interruptions" bin and requests confirmation of this assumption.	The most challenging data requirements center on heat mapping specifications and geographic visualization capabilities. PSE requests clarification of the required level of granularity for heat mapping and the specific format requirements - specifically whether the Commission expects image files or ESRI/ GIS source files for submission.	N/A	N/A
5.	Number of customers experiencing more than eight hours of consecutive	PSE requests clarification on whether this metric counts each unique instance of a customer experiencing over eight hours of outage, or the total number of customers	The most challenging data requirements center on heat mapping specifications and geographic visualization capabilities. PSE requests clarification on the required level of granularity for heat	N/A	N/A

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	interruption per year, providing separate calculations without MEDs for the service territory as a whole and separately for Named Communities	who have experienced at least one eight-hour outage during the reporting period. Additionally, PSE requests clarification on why this metric excludes Major Event Days (MEDs) when other reliability metrics include both MED and non-MED reporting, as this limitation creates inconsistency across the reliability metric framework and may not provide a complete picture of customer interruption experiences.	mapping and the specific format requirements - specifically whether the Commission expects image files or ESRI/ GIS source files for submission.		
6.	Number of Customers in Arrears	PSE is unable to provide customer arrearage totals separated by the division for dual fuel customers due to limitations with the underlying arrearage data system of record. Arrearage amounts and customer counts can be presented separately for Electric Only, Gas Only, and Dual Fuel service types	N/a	N/a	N/a
7.	Percentage of arrears with AMPs	N/A	N/A	N/A	N/A
8.	Average Energy Burden	PSE requests clarification on the methodology intended for calculating "Average Energy Burden" as defined in the metric request. PSE seeks confirmation that "Annual residential bill divided by area median income by census tract for all customers" is meant to describe the following calculation method: taking the median annual residential bill for all customers in a census tract and dividing	N/A	N/A	The current metric definition includes multiple segmentation dimensions (census tract, service type, pre- and post-energy assistance, and Named vs. Non-Named Community status) which may result in a

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		that value by the area median income for that same tract. If this interpretation is correct, PSE notes that this approach may not fully align with standard definitions of energy burden, which are typically calculated at the individual customer level. PSE requests clarification of the methodology for calculating values " ... before and after assistance" broken down by electric and natural gas service. Some forms of energy assistance apply to a customer's total bill, such that it cannot be broken down into assistance going to electric vs. natural gas bills. It is unclear what the phrase "electric and natural gas service should be stated separately" pertains to. How does this division interact with the stipulation of performing a bill-divided-by-median-income calculation for each census tract? Finally, PSE requests clarification regarding the expectations of the segmentation between "Named and Non-Named Communities." How does this division interact with the stipulation of performing a bill-divided-by-median-income calculation for each census tract?			wide range of calculation permutations. PSE requests that the Commission provide a preferred data structure or formatting template to promote consistency in interpretation and to ensure reporting aligns with expectations.
9.	Net Benefits of DER	The metric states "Net present value of benefits and cost-effectiveness ratio of	N/A	N/A	N/A

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		DERs as measured through a *Commission approved cost-benefit analysis*." The Commission has not approved a DER cost-benefit analysis, so what should be used for this metric?			
10.	DER Availability and Utilization	N/A	N/A	N/A	N/A
11.	Utility Assistance Program Effectiveness [E&NG]	PSE requests clarification on the definitions of "customer-funded assistance funds dispersed" and "customer-funded assistance received" to ensure consistent interpretation of the metric. Additionally, PSE requests clarification on the definition of "estimated low-income needs" in this context. If this refers to the Energy Assistance Need (EAN), PSE notes that this metric traditionally captures the assistance gap associated with high energy burden, rather than estimated low-income. If the intent is to use EAN or a similar construct, PSE recommends confirming that it reflects energy burden-related needs specifically.	N/A	N/A	N/A
12.	Customers who participate in one or more bill assistance programs [E&NG]	The number and percentage of estimated low-income customers who participate in one or more customer-funded energy assistance programs that actively lowers energy burden, both aggregated and by census tract; and separately the number and percentage of estimated low-income population enrolled in a utility bill discount	PSE requests clarification on whether the metric referring to "estimated low-income customers" should instead, or additionally, reflect customers with high-energy burden, as these are distinct but overlapping groups. PSE also seeks confirmation that all figures should be calculated at the annual level.	N/a	N/a

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		program and total amount of discount applied annually.	In addition, PSE requests clarification on the definition of a "utility bill discount program." Should this be interpreted as PSE's Bill Discount Rate (BDR) program and PSE's Home Energy Lifeline (HELP) program or also include other direct bill assistance discount programs (ex. CCA low-income credits)?		
13.	Annual utility revenues and rate impacts [E&G] -	One of the primary challenges lies in the fundamental lack of clarity around whether the metric is intended to reflect approved revenue changes or actual collected revenue. If it is the former, this information is already included in Commission-approved filings, making it potentially redundant and inefficient to restate. If it is the latter, this introduces significant complexity and variability due to fluctuating billing determinants, seasonal load variances, and customer behavior changes that can substantially impact actual collections versus approved amounts. Moreover, rate changes frequently take effect throughout the billing cycle, creating blended rates across billing periods. It is unclear how to allocate or handle these partial-month impacts consistently. Additionally, reflecting estimated impacts from proposed revenues in filings involves	Several elements of this metric are inherently difficult to standardize across time periods and create operational challenges for utilities. Billing systems apply blended rates across customer bills when tariff changes occur mid-bill cycle. Parsing these into discrete monthly incremental revenues introduces manual work and assumptions that reduce precision and increase the potential for errors. Each rate filing is built on different billing determinant assumptions, which vary by program schedule and customer class. This creates challenges for making "apples-to-apples" comparisons when assessing total annual impact, especially regarding "net bill revenue by schedule." PSE assume "schedule" means "customer class" within the "net	PSE has found that spreadsheet-based reporting (e.g., Excel templates) is both flexible and familiar for regulatory reporting, but it can become unwieldy when reporting requirements break down across dozens of schedules and customer classes, potentially on a monthly basis. Large files are more prone to manual error and lack proper version control. Additionally, the	Yes, standardized templates and format guidance would be extremely beneficial for this metric. Specifically, PSE would find the following tools valuable: • A definition sheet or data dictionary explaining how to calculate "net billed revenue" and how to report mid-month changes. • A monthly reporting format template that outlines expectations for

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		comparing revenues with different billing determinant assumptions (e.g., varying 12-month volume projections), making it difficult to draw consistent or accurate comparisons across the reporting year. Finally, there is no guidance on how to treat rate adjustments approved late in the year (e.g., a Purchased Gas Adjustment effective in November) compared to those implemented at the beginning of the year (e.g., Bill Discount Rate funding effective in January). Should this be prorated across months or included in full? Similarly, how should we treat adjustments that were approved but not yet implemented within the reporting year?	bill revenue by schedule" requirement, but clarification would be helpful. In some cases, particularly for large commercial or industrial schedules, disaggregated revenue data may be considered confidential or competitively sensitive. Care would be needed to aggregate or anonymize this data appropriately. Additionally, ensuring protection of customer privacy when dealing with smaller classes or subclasses is critical, should these limited-size classes or groups be excluded from reporting requirements to maintain confidentiality?	absence of standardized formats will make the information less helpful for comparing across utilities and may lead to inconsistent interpretations of the requirements.	each row/column (e.g., revenue by class, by month, by rate schedule). • Guidance on how to treat partial-year changes, overlapping rate filings, or deferred revenue recognition. • Clear instructions on confidentiality protection and data aggregation requirements. These tools would improve consistency across utilities, reduce administrative effort, and facilitate more meaningful cross-utility comparisons by the

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					Commission while ensuring data quality and regulatory compliance.
14.	Workforce Diversity	There are no issues with PSE's ability to comply with this metric.	PSE does not have difficulty with obtaining data for this metric.	N/A	A template would be beneficial.
15.	Supply Diversity	PSE was already incorporating the information required for the metric into standard supplier information requests when the UTC established this reporting requirement. Supplier user adoption of our supplier registration platform (mentioned below) for current suppliers is an ongoing effort and continues to be a challenge to retroactively acquire the business ownership information required for accurately reporting this metric.	System/technical limitations/integrations connecting spend and supplier information are currently a manual effort due to data existing across multiple systems. PSE is currently working to automate these manual processes in order to bring efficiency to reporting for this metric.	PSE leverages a third-party supplier registration tool/platform to collect and maintain supplier ownership information required for the metric. There have been challenges requiring current suppliers to register with the platform (agreeing to the tool's terms of service, etc.). However, in most instances, the platform provides a standard template for suppliers to submit ownership	Clarify types of spend to be included/not included in the metric: If there are any standard exclusions that all reporting entities may utilize for ensuring reported spend is comparable across utilities. For example, the OMWBE has published a list of Categories of Spend to be included or not included in diverse business spend reporting for state agencies (What Is Counted in the Report | Office of Minority and Women's Business Enterprises). Similar

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				information that is reviewed, and third-party or self-certifications are confirmed by the platform, and the information is then exportable and easily reported. This allows PSE to have confidence in the data behind our metric reporting. There is a cost associated with maintaining this platform that may prove to be cost-prohibitive for other agencies looking to utilize a similar tool.	guidance for PSE would be helpful. Communication about why PSE is collecting the information on business ownership: If the Commission provides standard messaging related to this metric that PSE can utilize when communicating with suppliers about the collection of this information that will greatly support the request process with current/new suppliers.
16.	Equity in DER Programs	PSE reports known low income in its metrics.	PSE's preference is to report on buckets of DER programs (e.g., Energy Efficiency, Community Solar, Demand Response)	The focus of the population should be clear whether it is low-income or named communities.	PSE prefers to retain flexibility in reporting templates.
17.	Equity in DER Program Spending	PSE current guidance is to report spending characterized as direct benefit to the customer (e.g. incentive payments for	N/A	N/A	N/A

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		Demand Response events, value of certain equipment supplied to participate in the Demand Response program, Energy Efficiency rebate incentive amounts, where applicable custom grants and incentives for commercial industrial customers, funds supplied to customers supporting Electric Vehicle Charging Equipment, solar or battery installation or technical equipment required to tie into the infrastructure system where applicable); or covering the costs to participate in PSE's Community Solar program.			

Performance metrics established by the Commission as part of 2024 MYRP					
Operational Efficiency	**Metric**	**Response – 1A Clarity/Challenges**	**Response – 1B Difficulty in Obtaining Data**	**Response – 1C Formats – Effective or Challenging**	**Response – 1D Standardized Templates**
	1. O&M total expenses divided by operating revenue	None	Because data is used from an already filed report, there is no difficulty in obtaining the information.	None.	No.
	2. Operating revenue divided by Average of Monthly Averages (AMA) total rate bases and	None	Because data is used from an already filed report, there is no difficulty in obtaining the information.	None.	No.

Performance metrics established by the Commission as part of 2024 MYRP					
	by End of Period (EOP) total rate base				
	3. Current Assets divided by Current Liabilities	PSE presents separately, by Gas and Electric, Current Assets divided by Current Liabilities from the Company's Balance Sheet, allocated using Working Capital methodology where necessary, to assess a gas or electrical company operating under a multi-year rate plan. These metrics are presented on an EOP basis, and an AMA basis. The metrics align with how these are reflected in rates.	Because data is used from an already filed report, there is no difficulty in obtaining the information.	None.	No.
Earnings	4. Net Income divided by Operating Revenue	PSE does not calculate a normalized Net Income for the CBR, so the measure that is used for Net Income is not on a consistent basis with other financial measures reported. PSE does use the normalized CBR Operating Revenues for the denominator of this measure to be consistent with other Table 4 metrics. We also provide a measure using net operating income from the CBR for one consistent measure.	N/A	N/A	N/A
	5. Retained Earnings divided by Total Equity	None	Because data is used from an already filed report, there is no difficulty in obtaining the information.	None.	No.
	6. Average Annual Bill Impacts -	Clarity of definitions would be helpful. Is the Commission seeking an "average annual bill impact" for each customer	Developing representative load profiles or customer archetypes would significantly improve comparability, as	A shared set of hypothetical load profiles would help	Report bill impacts based on standardized

Performance metrics established by the Commission as part of 2024 MYRP					
		class, specifically for the residential class, or RCI (residential, commercial, and industrial)? Would the "average annual bill impact" be expressed as a dollar amount or percentage? Additionally, calculating a representative "average" annual bill per customer class is complex due to seasonal usage variability, rate tiers, and diverse consumption patterns within each class. Would a standardized class profile be utilized, and if so, would the "average annual bill impact" reflect the difference between bills in January compared to December, or would it represent a true 12-month average across the year? Furthermore, should optional program participation be considered in these calculations?	monthly usage patterns and billing determinants must be standardized across utilities for meaningful analysis. What methodology should be applied to classes with only one customer? Ensuring protection of customer privacy when dealing with smaller classes or subclasses is critical, should these limited-size classes or groups be excluded from reporting requirements to maintain confidentiality?	standardize assumptions and improve comparability across utilities. This approach would eliminate variability in underlying assumptions and create more consistent analytical frameworks for bill impact assessments. However, utilities often categorize customer classes and rate schedules differently; thus, aligning classes with regulatory definitions introduces a risk of misalignment unless definitions are standardized.	annual load profiles developed by the Commission to ensure consistency. Guidance on calculations and classes or templates would be extremely helpful for utilities in preparing these analyses. The Commission could provide baseline usage profiles to improve standardization; for example, 800 kWh monthly consumption for a typical residential customer, with corresponding profiles for commercial and industrial classes that

Performance metrics established by the Commission as part of 2024 MYRP					
					reflect representative demand patterns and usage characteristics.
	7. Average Annual Bill divided by Median Income by Census Tract	N/A	N/A	N/A	N/A
Affordability	8. Average Annual Bill Impacts	N/A	The April 30 compliance filing deadline is challenging because the data needed to calculate this measure comes from various internal and external sources and is not available until the end of the second quarter.	N/A	N/A
Energy Burden	9. Average Annual Bill divided by Median Income by Census Tract	N/A	The April 30 compliance filing deadline is challenging because the data needed to calculate this measure comes from various internal and external sources and is not available until the end of the second quarter.	N/A	N/A