

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

ICNU DATA REQUEST NO. 148

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Please state the reason or reasons for limiting PSE's HMW replacement program to 50-70 miles per year.

Response:

Puget Sound Energy's ("PSE") 25-30 year plan for replacement of High Molecular Weight cable, which equates to about 50-70 miles per year, is driven by PSE's historical approach of replacing cable after multiple failures occur. Additionally, the funding level associated with replacing failed cable was limited by the traditional ratemaking expectations that aligned investment with revenue associated with customer growth.

However, as stated in the Prefiled Direct Testimony of Booga K. Gilbertson, Exhibit BKG-1T, at page 31, PSE has experienced an increase in power outages caused by underground cable failures at a rate of 8% a year since 2013. The 25-30 year plan will no longer maintain PSE's reliability level and significant reliability benefits can be achieved by approaching replacement more proactively in order to protect customers from these outages.