

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION****Dockets UE-170033 and UG-170034  
Puget Sound Energy  
2017 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 468****PUBLIC COUNSEL DATA REQUEST NO. 468:****Re: Rebuttal Testimony of Catherine Koch, Exh. CAK-4T at 12:20-22, 13:1-5  
(Reliability Investment Opportunity).**

Ms. Koch states:

The transparency of the proposed ECRM provides an opportunity to improve reliability beyond historic levels for tree related and cable related power outages, but it comes with added cost. By virtue of the ECRM, PSE can address WPCs more aggressively and proactively prevent outages from impacting service by failure-prone HMW direct bury cable. Approval of the ECRM would demonstrate the Commission's agreement that accelerating reliability spending beyond historical levels is a reasonable and measured approach to improve reliability for customers.

Please respond to the following:

- a. Explain each reason why the Commission could not "demonstrate" its "agreement that accelerating reliability spending beyond historical levels is reasonable" in the context of traditional ratemaking and without approving the proposed ECRM mechanism.
- b. Confirm that PSE will not increase its capital investment levels to "more aggressively and proactively prevent outages from impacting service" in the absence of incremental ECRM rate increases, or explain any inability to provide such confirmation.
- c. Provide complete copies of all reports, analyses, workpapers, projections and other documents associated with or relied upon in your responses to parts (a) and (b).

**Response:**

- a. Please see Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 047. Under traditional ratemaking, engagement in determining agreement of this accelerated expenditure does not occur until several years after the work is completed in a subsequent general rate case and is demonstrated by approval of the investment in rates. Please see the Prefiled Rebuttal Testimony of Catherine A. Koch, Exhibit CAK-4T, at pages 4-5.
- b. Please see the Prefiled Rebuttal Testimony of Catherine A. Koch, Exhibit CAK-4T, at pages 4-5 and PSE's Response to Public Counsel Data Request No. 071(e). PSE will continue to invest in reliability at its historic levels to address the worst performing circuits and to replace High Molecular Weight cable when it fails.
- c. PSE's responses to subparts (a) and (b) speak for themselves.