

**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. 469****PUBLIC COUNSEL DATA REQUEST NO. 469:****Re: Rebuttal Testimony of Daniel Doyle, Exh. DAD-7T at 22:17-20 (ECRM).**

Mr. Doyle states that the proposed new Electric Cost Recovery Mechanism would, “allow PSE to proactively address deteriorating underground direct-bury high molecular weight cable before an outage impacts customers and to more aggressively address infrastructure failures or limitations of PSE’s worst performing distribution.” Please identify, explain and quantify each reason why Mr. Doyle believes PSE is unable or unwilling, in the absence of an ECRM, to “proactively address” service quality issues with the needed levels of investment and expense commitments by management.

**Response:**

The Prefiled Rebuttal Testimony of Daniel A. Doyle, Exhibit DAD-7T, neither states nor suggests that Puget Sound Energy (“PSE”) is unable or unwilling, in the absence of an Electric Cost Recovery Mechanism (“ECRM”), to proactively address service quality issues with the needed levels of investment and expense commitments by management. Rather, the Prefiled Rebuttal Testimony of Daniel A. Doyle, Exhibit DAD-7T, asserts that the ECRM would allow PSE to recover costs associated with a material and significant program while reducing the burden of frequent general rate cases. Absent the ECRM, PSE would likely fund the Electric Reliability Program over a longer period of time and seek to recover those costs through more frequent rate cases.