BEFORE THE
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of the Petition of: PUGET SOUND ENERGY For Penalty Mitigation Associated with Service Quality Index No. 11-Electric Safety Response Time Annual Performance for Period Ending December 31, 2021	Docket No. UE-22_____ PETITION FOR PENALTY MITIGATION

I. INTRODUCTION

1. In accordance with WAC 480-07-370, Puget Sound Energy ("PSE" or the "Company") respectfully petitions the Commission for an order granting a waiver of the $613,636 penalty associated with PSE's Service Quality Index ("SQI") No. 11- Electric Safety Response Time ("SQI-11") for the 2021 SQI program year. PSE's 2021 SQI-11 annual performance is an overall average of 65 minutes whereas the benchmark is 55 minutes. As described in this petition ("Petition"), PSE was unable to meet the benchmark due to the combination of resource constraints, uncontrollable external factors, and a significant increase in the Electric First Response ("EFR") workload occurring throughout the year of 2021.

2. PSE is engaged in the business of providing electric and gas service within the State of Washington as a public service company, and is subject to the regulatory authority of the Commission as to its retail rates, service, facilities and practices. PSE provides natural gas service to over 850,000 customers and electric service to approximately 1.2 million customers in Washington.

3. PSE's representative in this proceeding is:

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4. Rules and statutes that may be brought at issue in this Petition include RCW 80.01.040 and WAC 480-07-370.

5. This Petition presents the facts that constitute the basis of PSE's request for waiver of the penalty: a background summary of PSE's SQI program and SQI-11 (Section II), SQI penalty mitigation standards (Section III), the unusual and exceptional circumstances that impacted PSE's electric operations in 2021 (Section IV), PSE's level of preparedness and response time (Section V), PSE's analysis on why the impact of these exceptional circumstances could not be prevented (Section VI), and a conclusion of PSE's requested relief (Section VII).

II. BACKGROUND

A. 1995-1996 Merger Dockets[1]

6. PSE first implemented its Service Quality Index Program ("SQI Program") in 1997 pursuant to Dockets UE-951270 and UE-960195, the dockets approving the merger of Washington Natural Gas Company and Puget Sound Power & Light Company ("Merger"). The purpose of the SQI Program is to "provide a specific mechanism to assure customers that they will

[1] Dockets UE-951270 and UE-960195.

not experience deterioration in quality of service"[2] and to "protect customers of PSE from poorly-targeted cost cutting"[3] as a result of that Merger.

7. PSE's SQI Program currently includes electric and natural gas Customer Service Guarantees, two electric Restoration Service Guarantees, and a set of nine service quality indices that require PSE to meet benchmarks in customer satisfaction, customer services, and operations services.

B. SQI-11 Electric Safety Response Time

8. Since 1997, PSE has continued its SQI program with both temporary and permanent modifications authorized by the Commission. One of the key changes is the addition of SQI-11, which was approved initially by the Commission in its June 20, 2002 Twelfth Supplemental Order in consolidated Dockets UE-011570 and UG-011571 ("2001 General Rate Case" or "2001 GRC")[4]. This SQI-11, measuring average number of minutes from customer call to arrival of electric first responder, was proposed by the parties of the 2001 GRC in a multi-party settlement stipulation ("Settlement Stipulation") following a series of SQI collaborative meetings.

9. The current SQI-11 mechanics were approved by the Commission in Order 01 of Docket UE-031946, dated May 11, 2004 ("Order 01").[5] In that docket, PSE submitted a proposed amendment to SQI-11 after realizing that the reporting and tracking requirements for SQI-11

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[2] Appendix A to the Fourteenth Supplemental Order Accepting Stipulation; Approving Merger at page 11 in Dockets UE-951270 and UE-960195 (Feb. 5, 1997).

[3] Fourteenth Supplemental Order Accepting Stipulation; Approving Merger at p. 32 in Dockets UE-951270 and UE-960195 (Feb. 5, 1997).

[4] Consolidated Dockets UE-011570 and UG-011571 Twelfth Supplemental Order; Rejecting Tariff Filing; Approving and Adopting Settlement Stipulation Subject to Modifications, Clarifications, and Conditions; Authorizing and Requiring Compliance Filing, and Notice of Intent to Supplement Service of the Commission's Twelfth Supplemental Order. https://apiproxy.utc.wa.gov/cases/GetDocument?docID=1160&year=2001&docketNumber=011570

[5] Docket UE-031946 Order No. 01 - Order Granting Application; Approving Agreement Regarding SQI-11 Amendment with Modifications. https://apiproxy.utc.wa.gov/cases/GetDocument?docID=40&year=2003&docketNumber=031946

for a localized emergency event, in which less than five percent of all PSE's electric customers are out of electric service, would have the same impact on PSE's ability to track and report response times as is experienced by PSE in the course of a major event in which five percent or more customers lose electric service. Subsequently, PSE and the other executing parties to the Settlement Stipulation agreed to amend SQI-11, and the Commission approved the amendment.

10. The following summarizes the current SQI-11 mechanics, including the changes adopted in Order 01 and a minor change adopted in 2010[6]:

i) **Annual Performance:** Annual performance is calculated as the average number of minutes from customer call to arrival of electric first responder.

$$\textit{Annual electric safety response time} = \frac{\textit{sum of all response times}}{\textit{annual number of electric safety incidents}}$$

ii) **Suspension Days:** SQI-11 performance measurement is suspended on: 1) days that five percent or more of electric customers are experiencing an electric outage and subsequent days when the service to those customers is being restored (i.e., "Major Event Day"); and 2) days that are determined by the Company to be "Localized Emergency Event Day" as defined by the dispatch and utilization of all available electric first responders to the affected Local Area to respond to service outages. Local Areas are defined as one of five electric first-responder operating bases throughout the PSE service territory.

iii) **Reporting of Suspension Days:** Supplemental reporting requirements include that – on Major Event Days and Localized Emergency Event Days during which performance measurement of this index is suspended – PSE will account for and report the number of outage events and the number of customers affected by Local Area along with the status of resource deployment. This supplemental reporting has been part of the SQI annual

[6] Order 17 of consolidated Dockets 072300 and 072301, page 10, section 26, granted the housekeeping change to the first condition of days that are subject to the suspension of SQI-11 from a predefined term of "Major Event" day to the generic definition of the "5% or more of electric customers are experiencing an electric outage".

and semi-annual service quality performance reports since 2004 as Attachments A and B to Exhibit A of the annual and semi-annual SQI performance reports. For the purpose of the Petition, Major Events and Localized Emergency Events are referred as "Significant Outage Events".

iv) **Performance Level at Which Maximum Penalties Would Be Imposed:** If PSE's annual SQI-11 is at 79 minutes average response time or more, the maximum penalty of $1.5 million would be imposed.

v) **Penalty Calculation**: In the event, PSE's annual SQI-11 performance is more than 55 minutes, the potential penalty would be calculated as follow:

*Potential Penalty =((Average Response Time – benchmark) / benchmark) * 10 * penalty per point*
Benchmark = 55 minutes from customer call to arrival of field technician
Penalty Per Point = $337,500

11. The local areas are shown in the following table ("Local Areas"):

Local Area	**County(s)**	**Number of Electric First Responders as of December 2021**
North	Skagit, Whatcom, Island	15
West	Kitsap	14
South	Thurston, Pierce	16
North Central	King – North of Cedar River	19
South Central	King – South of Cedar River	13
Total		77

III. SQI PENALTY MITIGATION STANDARDS

12. The Merger Stipulation provides the following mitigation standard:

> The standard to be applied for such a petition is that the penalty is due to unusual or exceptional circumstances for which PSE's level of preparedness and response was reasonable. PSE will not file a mitigation petition unless it believes, in good faith, that it meets this mitigation standard. The parties contemplate that, following a procedure to be established by the Commission, a Commission order will be issued assessing any penalties and resolving any mitigation petition.[7]

13. The updated Appendix 2 to Exhibit J, PSE's SQI program mechanics[8] provides the following:

> In the annual report, the Company may include a mitigation petition for relief from penalty, if it believes, in good faith, that it meets the mitigation standard. The standard to be applied for such a petition is that the penalty is due to unusual or exceptional circumstances for which PSE's level of preparedness and response was reasonable. PSE will not file a mitigation petition unless it believes, in good faith, that it meets this mitigation standard. The parties contemplate that, following a procedure to be established by the Commission, a Commission order will be issued assessing any penalties and resolving any mitigation petition.[9]

14. The facts and discussions presented in this Petition demonstrate that PSE's inability to meet the 2021 SQI-11 benchmark is due to unusual and exceptional circumstances and that PSE's level of preparedness and response has been reasonable.

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[7] Dockets UE-951270 & UG-960195, Fourteenth Supplemental Order Accepting Stipulation; Approving Merger (February 5, 1997) (Stipulation at 13:10-15).

[8] Dockets UE-011570 and UG-011571 (Consolidated) in Compliance with Order 25 of Dockets UE-072300 and UG 072301 (Consolidated)

[9] *Id.*

IV. PSE EXPERIENCED UNUSUAL AND EXCEPTIONAL CIRCUMSTANCES

A. Unusual Events

15. Washington State experienced many unusual weather events in 2021, including the record-breaking heat in summer and a streak of record-breaking snowfall near the end of the year. The Seattle Times, in its December 31, 2021 article, "From record high temperatures to bitter cold days, Western Washington's year of extreme weather"[10], identified the following five significant weather events:

- Significant wind and rainstorm in January
- Heavy snow in February
- Record-breaking June heat
- Wettest fall on record
- November-December atmospheric rivers

16. After days of rains at the beginning of January 2021, starting from January 12th, strong winds with gusts from around 50 mph in the lowlands and around 80 mph in the mountains visited the state. These winds toppled trees and resulted in almost 50 percent of PSE customers being without electric service.

17. On February 13, 2021, 8.9 inches of snow was recorded at the Sea-Tac airport, which marked the snowiest single day recorded in the month of February at the airport.

18. The heat wave during the period of June 24th through June 28th set many records for the Seattle area, including three straight days at 100 degrees or hotter and the all-time hottest temperature on record of 108 degrees on June 28th.

19. In the fall, a series of wet storms brought heavy rain and strong winds to the region and Gov. Jay Inslee declared a severe weather emergency because of landslides and severe flooding. The National Weather Service said that the 19.04 inches of rain that fell in Seattle between

[10] Cartridge, Christine. "From record high temperatures to bitter cold days, Western Washington's year of extreme weather", Seattle Times, Dec. 31, 2021 at 6:00 am and Updated Dec. 31, 2021 at 2:52 pm.
https://www.seattletimes.com/seattle-news/weather/the-seattle-areas-5-most-extreme-weather-events-of-2021/

September 1st and November 30th broke a record set in 2006. Bellingham also broke its wettest fall record set in 1990 with 23.55 inches of rain for the same period. Two weeks of rain beginning on November 18th brought heavy rainfall that caused near-record flooding at the Skagit and Nooksack rivers in Whatcom County and blocked portions of Interstate 5 south of Bellingham and many roads on the Olympic Peninsula.

20. The year ended with a cold snap. On December 26th, the 20 degree low temperature at the Sea-Tac Airport reset the lowest temperature record of 22 degrees for that date in 1948. December 27th became a second day of record-breaking lows for the date. The three-day period of December 26th through December 28th is the longest stretch of subfreezing weather since 1998.

21. These unusual weather events resulted in Significant Outage Events that had a considerable impact on PSE resources and customers, although they were excluded in SQI-11 performance calculation. The same electrical first response employees respond to the Significant Outage Events as well as the "blue sky" electric outage events, the latter of which is measured in SQI-11. The magnitude of the number of these Significant Outage Events has an impact on the fatigue of the workforce day-in and day-out. Overall, 55 days out of the 365 days in 2021 were excluded from this SQI-11 performance measure, and the PSE EFR work force had been fully deployed during these 55 suspension days. This is 16 more days with severe weather outage events than the annual average of 39 suspension days for the period of 2016 through 2020, a 40% increase.

22. Table 1 summarizes, by month and by weather cause, the Significant Outage Events that PSE's electric first responders responded to in 2021 and the affected number of customers, including the above five extraordinary weather events related outages. The table is based upon the supplemental reporting for SQI-11, Attachment A of Appendix A to the 2021

annual SQI report, which PSE is required to account for electric first responders and the status of crews deployment during any Significant Outage Events by days.[11]

Table 1: SQI-11 Suspension Days - Significant Outage Events

Month	Type of Weather Event	No. of Event Days	No. of SQI #11 Significant Outage Events	No. of Customers Affected
Jan	Wind	4	163	31,479
	Wind/Rain	6	1,952	447,144
Feb	Heavy Snow	2	263	39,622
	Wind/Snow	4	128	19,240
Mar	Wind/Snow	1	82	10,020
May	Wind	2	102	18,884
Jun	Extreme Heat	4	531	78,063
	Wind	1	14	4,990
Aug	Wind	2	29	5,281
Sep	Wind	2	30	2,922
	Wind/Rain	3	652	166,773
Oct	Wind/Rain	5	921	260,856
Nov	Wind/Rain	11	320	301,048
Dec	Snow/Ice	5	312	51,129
	Wind	3	236	54,268
Total		55	5,735	1,491,719

23. In addition, throughout the on-going COVID-19 pandemic PSE has encountered unique and evolving challenges that impact employees, including: increased time away from work to address employee illness or COVID-19 exposures, the implementation of new COVID-19 prevention policies, new field safety procedures and protocols, and difficulties in attracting and retaining a sufficient work force.

[11] Reporting of SQI-11 Suspension Days: See the 2021 SQI annual report, Attachments A and B to Appendix A SQI Monthly performance. Attachments A and B report SQI #11 performance measurement suspension days by day and Local Area.

B. Hiring and retention challenges

24. While PSE has operated in this COVID-19 pandemic environment since mid-2020[12], the length of time operating in this challenging environment increases the impact on personnel as time goes by. The evolving COVID-19 pandemic and government policies in 2021—including the surge of the OMICRON variant, federal and state mandates and changing vaccine requirements — add additional emotional and mental strain to the electric first responder workforce that is customer-facing on a day-to-day basis. PSE's safety and business continuity practices have kept this important workforce extraordinarily healthy, but over the course of 2021, PSE experienced many absences from the electric first responders due to either illness, exposures, or caring for family.

25. Seattle-area consumer price inflation outpaced the national average in the year ending in December 2021. From December 2020 to December 2021, the seasonally adjusted Seattle CPI rose 7.6% compared to the 7.1% increase in the U.S. City Average index.[13] According to the Office of Financial Management[14], Washington's population growth steadily increased by 61,600 people in 2021. As of April 1, 2021, Washington now tops 7,766,925 residents, with most of the growth concentrated in larger cities across the state. The pressure from this growth has led to a higher cost of living, especially in King County, and many people are finding it financially challenging to settle in these areas. With the requirement for electric first responders to be local and able to respond to emergency incidents quickly, PSE is experiencing a growing challenge to attract and retain this qualified workforce, particularly in King County. This growing challenge to attract electric first responders into King County

[12] Proclamations by Washington State Governor Inslee: 20-05, 20-25, 20-25.1, 20-25.2, 20-25.3, and 20-25.4 https://www.governor.wa.gov/sites/default/files/20-25.4%20-%20COVID-19%20Safe%20Start.pdf

[13] Washington State Economic and Revenue Forecast Council January 19, 2022 revenue review conference call meeting minutes:
https://erfc.wa.gov/sites/default/files/public/documents/meetings/ec20220203.pdf

[14] State population steadily increases, tops 7.7 million residents in 2021 | Office of Financial Management (wa.gov): https://ofm.wa.gov/about/news/2021/06/state-population-steadily-increases-tops-77-million-residents-2021)

is caused not only by the increasing cost of living, but also the demanding workload. As position vacancies open in counties outside of King County, it is common for the existing electric first responders in King County to relocate to outside of King County where the cost of living is less. Since 2012, on average, two King County electric first responders relocate to outside regions per year.

26. Overall, in 2021, PSE experienced longer electric safety response times in King County. The electric safety response time without the Significate Outage Events for King County is 73 minutes, whereas, the average electric safety response time for the other counties is 60 minutes.

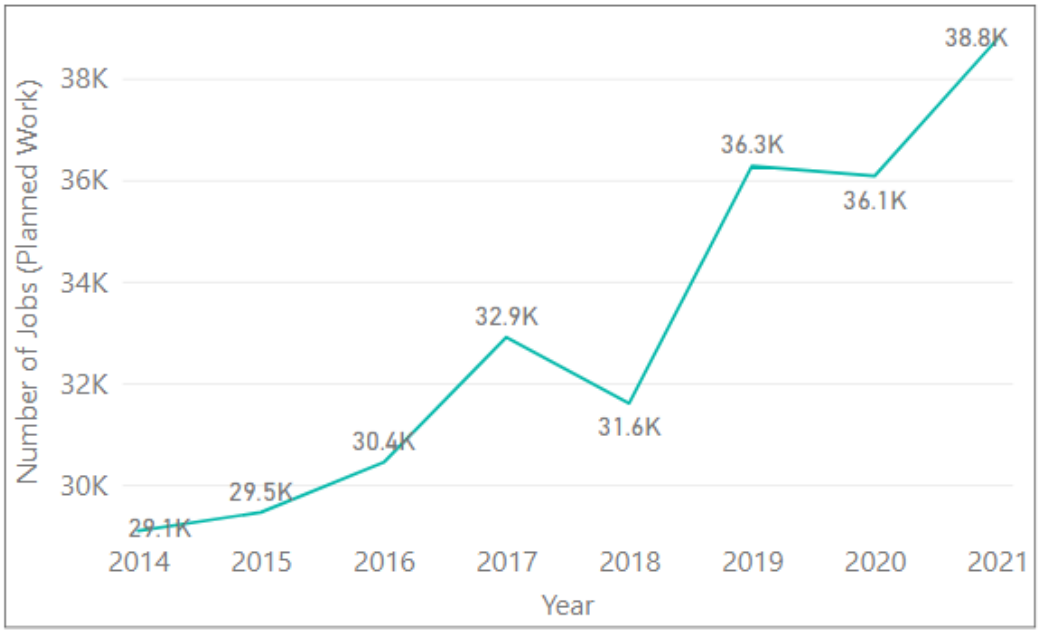
27. As vacancies occur, including those caused by relocations or retirements, PSE must begin the process of hiring and training new electric first responders. Attraction of new first responders is becoming increasingly challenging due to the significant infrastructure growth occurring across the electric utility industry, which drives demand for these highly trained and skilled workers. The qualifications and skillsets of this workforce are being sought by many utilities across the state and country.

C. Workload challenges

28. Figure 1 below displays the total number of customer-facing scheduled work projects that are performed by PSE's electric first responders. A major component of this work requires PSE's electrical first responders to disconnect and subsequently re-connect electric service at the customer's request so that the customers can work on their side of the meter. Additionally, included in this data are more complex electrical switching activities required to support municipality-driven projects and public improvement projects. These system projects are not part of the SQI-11 performance measurement, which is limited to electric safety response time associated with outage events; however, they are part of EFR's regular

responsibility. As the figure illustrates, PSE saw a 7% increase in these customer-requested projects in 2021 over 2020, and a 22% increase in 2021 over the pre-COVID-19 pandemic year of 2018. This large increase in customer-requested scheduled work is heavily impacted by a growing number of customer home renovation investments. These activities require an electric first responder to be present at the customer's home in order to physically disconnect the power routing to the customer's home and, as such, PSE must coordinate with the customer about when the electrical services need to be disconnected and re-connected for each project. In a time when many people are working from home, PSE's responsiveness to customer-requested scheduled remained a high priority.

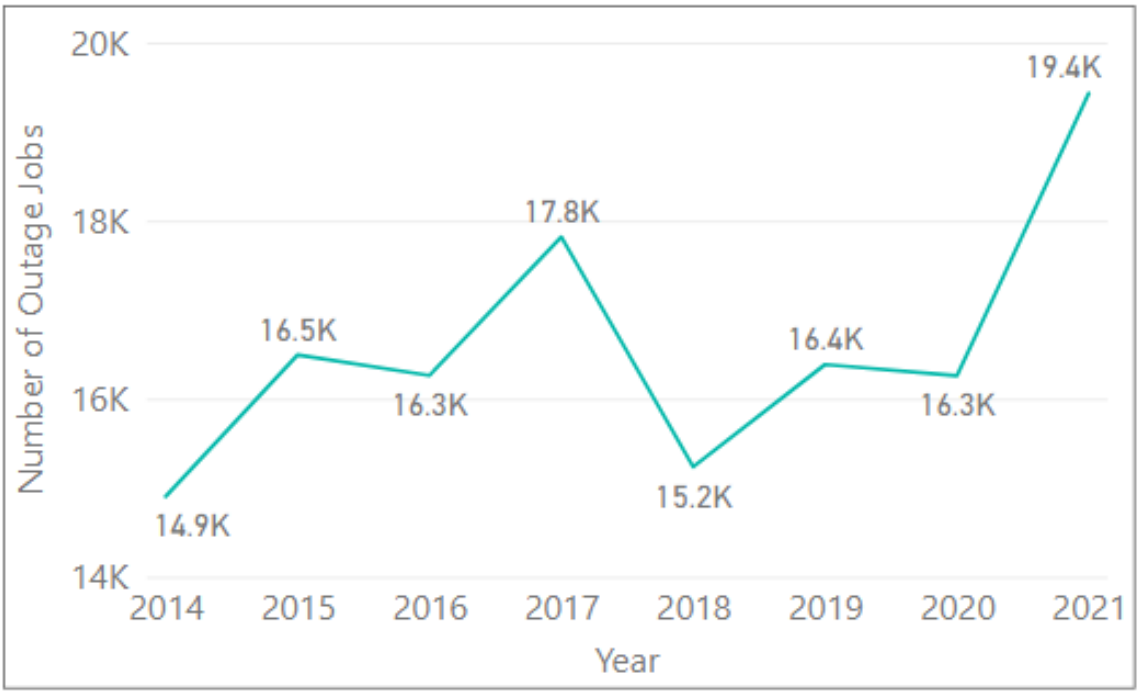
29. **Figure 1: Planned work performed by EFR – planned switching and customer-requested disconnects**



30. Additionally, as shown in Figure 2, a record number of total outages were experienced in 2021. The total outages exceeded 19,400, a 19% increase over 2020. These unplanned outages require response throughout all hours of the day and night, and this dramatic increase

in outage workload had a significant impact on the fatigue of the EFR employees in a year where the EFR resources were constrained by many factors, as described herein.

31. **Figure 2: All electric outages, including Significant Outage Events, by year**



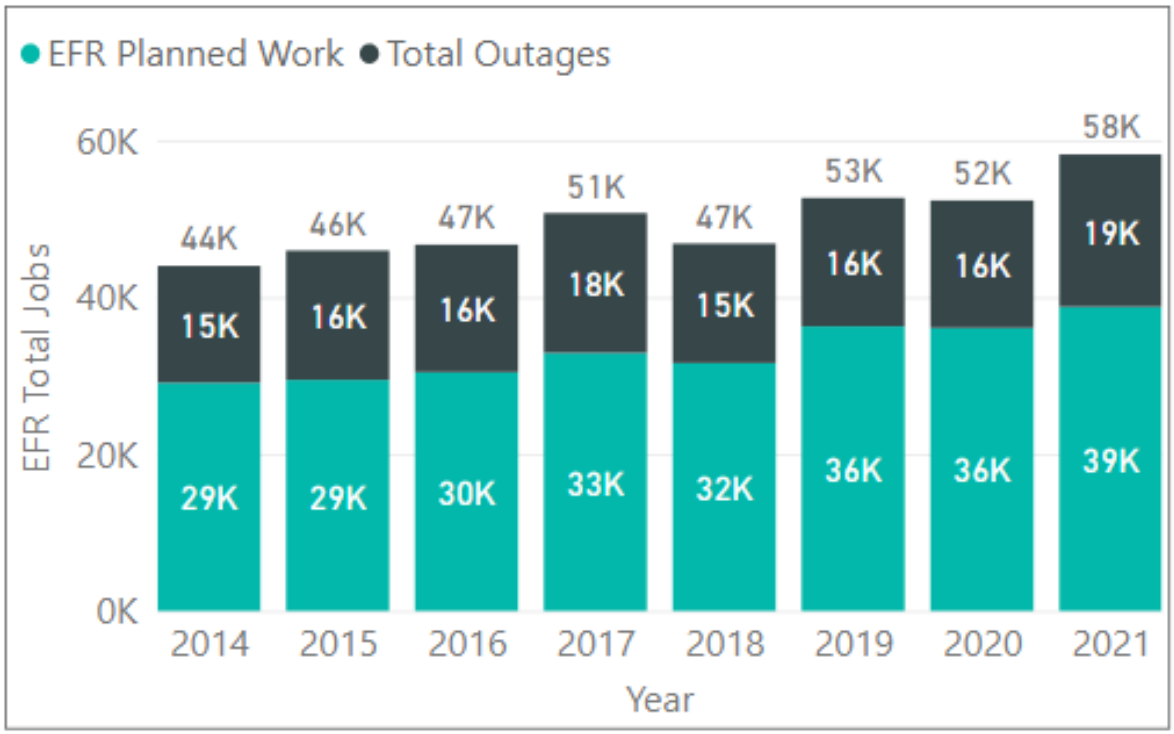
32. SQI-11 allows the exclusion of Significant Outage Events in the performance calculation when resources are fully deployed; however, the magnitude of the number of outages has an impact on the resilience and fatigue of the electric first responders day-in and day-out. Of the total 19,400 outages that occurred in 2021, 5,735 outages were excluded from this SQI-11 performance calculation or 55 suspension days out of 365 days in 2021. PSE's service territory experienced 18 days of Major-Event Days and 37 Localized Emergency Event Days in 2021. The high level of Significant Outage Event exclusions is indicative of the extremely busy and active days driven by inclement weather in 2021. This is on top of the marked increase in the quantity of scheduled EFR work for the year.

33. The on-going COVID-19 pandemic has also constrained PSE's ability to pursue the electric service reliability investments required to meet customer expectations. These impacts are multi-faceted, including limited jurisdictional support for construction permits, inspections and consultation; supply chain delays; workforce limitations; and customer safety concerns. These negative impacts occurred initially in March 2020 when the state implemented its first shutdown. The follow-on worker safety restrictions affected PSE's ability to deliver and complete both planned and unplanned work for 2020 and into 2021 and 2022.

34. This is coupled with environmental and weather conditions that are changing the trends of the causes for electric outages, such as the summer extreme heat impacts on equipment and trees that could not be prevented in 2021.

35. The total workload that the EFR workforce must respond to, including combining customer-requested scheduled work and outages is displayed below in Figure 3.

36. **Figure 3, EFR total workload – Planned work and unplanned outages, including SQI-11 excluded outages.**



V. PSE'S LEVEL OF PREPAREDNESS AND RESPONSE WAS REASONABLE

A. EFR Staffing Level

37. PSE's level of preparedness and response to the unusual and exceptional circumstances it faced in 2021 was reasonable. Moreover, PSE has taken, and continues to take, steps to improve the response time of the EFR team. These steps are discussed in more detail below.

38. PSE's electric first response workforce is a team of trained and qualified high voltage electric line workers located in each region of PSE's service territory, and they are responsible for the safe and reliable operation of PSE's electrical infrastructure. The EFR team provides first response support around the clock for all emergency incidents involving PSE's electrical infrastructure, as well as the essential support of planned customer work that requires a qualified electrical line worker.

39. Heading into 2021, PSE's EFR workforce had 77 positions, which is a number consistent with prior years. PSE experienced early retirements and out-of-state relocations in 2021 similar to what is being experienced elsewhere in these times across various industries, losing six electric first responders to unplanned or early retirements over the course of the year. PSE responded by analyzing the compensation market in the Pacific Northwest for these highly-skilled positions in order to attract and retain this critical workforce to allow PSE to continue to provide safe and reliable service. PSE hired new EFR employees throughout the year, with a goal of increasing the total number of EFR positions to 89. Due to attrition, PSE was not able to reach full staffing of 89 EFR employees. Additionally, PSE took steps to increase EFR staffing in remote areas, like Kittitas County, in order to improve electric service safety responsiveness.

40. Despite these EFR staffing increases and ongoing hiring efforts, EFR workforce retention at the required staffing level of 89 positions was not obtainable due to the factors described in subsection D -Hiring and retention challenges. Near the end of 2021, the actual number of EFR employees was 77. In the year 2021, PSE's EFR workforce responded extraordinarily by working an average of 1,100 hours of overtime, per employee, to meet all planned and unplanned work. However, the EFR workers were maxed out on all the different responsibilities. Although the EFR work force was able to provide extra capacity through overtime, the level of work resulted in work force fatigue and other issues discussed previously.

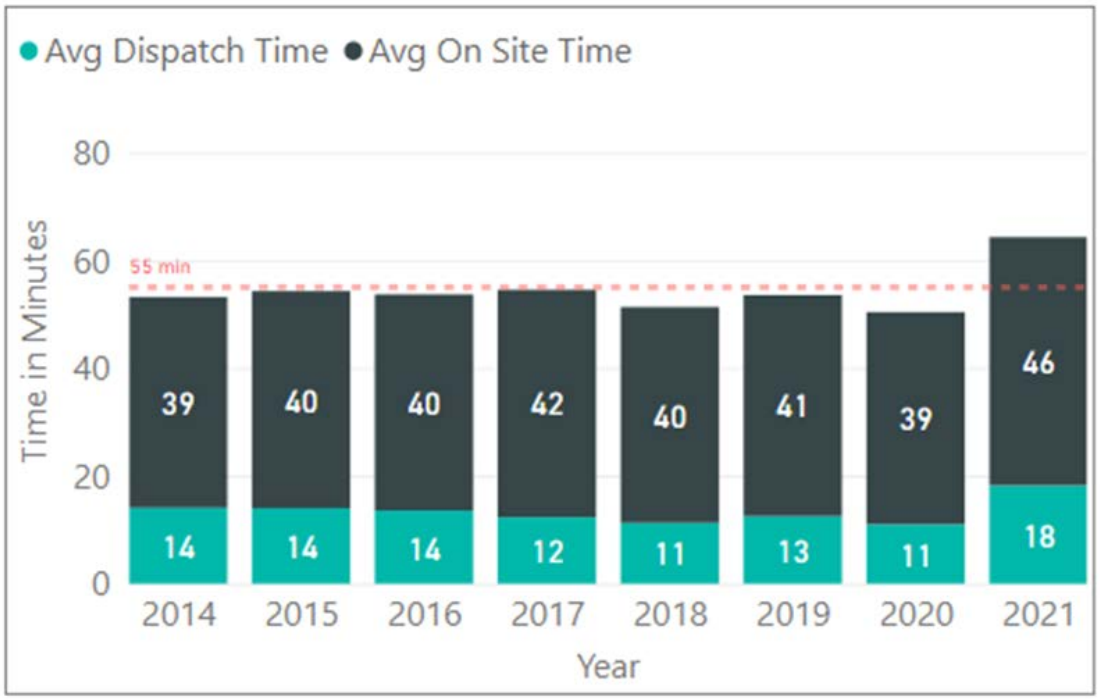
VI. THE IMPACT OF THESE CIRCUMSTANCES COULD NOT BE PREVENTED

41. For 2021, PSE's average annual response time for SQI-11 emergency incidents was 65 minutes, and this exceeded the benchmark for SQI-11 by 10 minutes. This is the first time that PSE has not met the SQI-11 benchmark since its inception in 2003.

A. Dispatch Time and On Site Time

42. Response time is comprised of two components: the time it takes to identify and secure an electrical first responder ("Dispatch Time"), and the subsequent time it takes for that EFR to travel to the location of the emergency incident, or outage ("On-site Time"). Figure 4 shows the average Dispatch Time and On-site Time for 2014 through 2021. PSE's Dispatch Time in 2021 was an average of 18 minutes, an increase of greater than 5 minutes over the 7-year average going back to 2014. While PSE's electric first responders worked record overtime, it took longer to secure an EFR, because of staffing shortages, for the reasons discussed above, and meanwhile the workload was at a record high in 2021, all of which affects Dispatch Time. As the year progressed, the compounding fatigue experienced by the EFR workforce was a contributing factor on how quickly an available resource could be identified and dispatched. Had PSE's Dispatch Time been in line with the average, PSE's SQI-11 would have been 60 minutes instead of 65 minutes at year-end.

43. **Figure 4: Dispatch Time and Onsite Time for unplanned outages**



B. Extreme Travel Events

44. In 2021, PSE experienced an average duration of 46 minutes of time for an EFR to travel to the jobsite, which is a 15% increase over the 7-year average going back to 2014. This increase in travel time was not anticipated going into 2021. There are differing theories regarding traffic conditions and vehicle accidents during the unusual year of 2021, but, as described more fully below, traffic volumes have increased back to pre-COVID-19 pandemic levels, with students returning to schools in campus settings.

45. Per WSDOT quarterly performance reports (Gray Notebook – September 2021) the number of serious injuries is higher than the 2016-2020 average[15], and TomTom reports the Seattle area broadly had 21% more traffic in 2021[16] versus 2020. The Seattle Times reported that 2021 was the deadliest year on Washington roads in the last 15 years. [17] Experts cannot point to a single reason for the cause of these traffic impacts, and they cannot say with any confidence whether the trend will continue. All of these reports suggest that traffic patterns, volumes, and impacts were different in 2021, which contributed to the aforementioned increase in travel time. For 2015-2020, annually, PSE electric first responders experienced about 150 extreme travel time events, which is defined here as any incident requiring a travel time of greater than two hours. Nevertheless, in 2021, the EFR workforce experienced 257 extreme travel time events. That is more than 100 extreme travel time events (or 71 percent more) per year than prior years. More than one third of these extreme travel time events

[15] Gray Notebook 83 - quarter ending September 30, 2021 (wa.gov)
https://wsdot.wa.gov/sites/default/files/2021-12/gray-notebook-Sep21.pdf
[16] Washington traffic report | TomTom Traffic Index
https://www.tomtom.com/en_gb/traffic-index/washington-traffic/
[17] Kroman, David, "2021 was the deadliest on Washington roads in 15 years, puzzling experts', The Seattle Times, Jan. 1, 2022 at 6:00 am Updated Jan. 1, 2022 at 2:12 pm
https://www.seattletimes.com/seattle-news/transportation/2021-was-the-deadliest-on-washington-roads-in-15-years-puzzling-experts/#:~:text=Washington%20ended%202021%20with%20more,point%20to%20a%20single%20reason.

occurred between September 2021 and December 2021 when the region experienced the wettest fall on record and November-December atmospheric rivers.

46. In addition to these extreme weather events, PSE also experienced a number of other unique reliability challenges. For example, a massive prolonged outage event occurred on November 1, 2021, due to vandalism as a pole being cut down in an attempt to steal copper conductor. This is among one of worst outage events since 2013.

47. Had these extreme travel events not occurred, PSE's SQI-11 would have been six minutes lower.

48. That is, without the impact of these extreme travel events; which resulted in an increase of six minutes to the overall SQI-11 average response time, and the five minutes increase in Dispatch Time due to the impact of the uncontrollable and unusual circumstances on EFR workforce and workload, PSE's SQI-11 could have been 54 minutes, which would be under the benchmark of 55 minutes.

VII. REQUESTED RELIEF OF SQI-11 PENALTY FOR 2021 ANNUAL PERFORMANCE

49. As demonstrated in this Petition, PSE was not able to meet the SQI-11 benchmark due to unusual and exceptional circumstances, which impacted PSE's electric first responder operations that are outside of PSE's control and could not be prevented. PSE believes that the $613,636 penalty associated with PSE's overall 2021 SQI-11 performance should be waived. PSE's level of preparedness and response has been reasonable especially in light of the circumstances encountered in 2021.

VIII. REQUESTED ACTION

20. For the reasons set forth above, PSE respectfully requests that the Commission issue an order that:

(1) Approves the mitigation relief requested and waives the $613,636 penalty associated with PSE's overall 2021 SQI-11 performance.

DATED: March 29, 2022

PUGET SOUND ENERGY

By _____

Jon Piliaris
Director, Regulatory Affairs