

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 278:

Re: Rebuttal Testimony of PSE Witness Mr. Thomas M. Hunt, Exhibit TMH-8T¹

Regarding the Safety and SQI goals, please provide the following information:

- a) Please provide the nine SQI goals.
- b) Please provide the number of times, and when, over the past 10-year period that PSE has not achieved at least six of the Safety and SQI goals.

Response:

- a) The nine SQI measures in Puget Sound Energy's ("PSE") Annual Goals & Incentive Plan were described in PSE's Response to Public Counsel Data Request Nos. 238 and 240. The results of the SQI measures for 2015-2018 were also provided in PSE's Response to Public Counsel Data Request No. 240.
- b) PSE's Annual Goals & Incentive Plan has two funding thresholds as described in the Prefiled Direct Testimony of Thomas M. Hunt, Exh. TMH-1T, at 27:13-19. In the past 10-year period, both funding thresholds have been met in every year. Accordingly, there was no year during the past 10-year period when PSE did not achieve at least six of the Safety and SQI goals.

¹ Note that Public Counsel's data request directed the question to Thomas M. Hunt but identified Exhibit MRM-11T. The substance of Public Counsel's request is best answered by Mr. Hunt.