

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 274:**

Please refer to Catherine A. Koch's Rebuttal Testimony, Exh. CAK-6T at 21:14-17, which refers to future benefits from AMI.

- a) Estimate the benefits from remote disconnects and reconnects associated with move-ins and move-outs. Provide all calculations, assumptions, workpapers, and other materials used to develop your answer.
- b) Is PSE willing to commit to reductions in the revenue requirement equal to the amounts of the remote disconnect and reconnect benefit estimate? If not, why not?
- c) Estimate the benefits from future demand response enablement. Provide all calculations, assumptions, workpapers, and other materials used to develop your answer.
- d) Is PSE willing to commit to these demand response impacts in its next integrated resource plan? If not, why not?
- e) Estimate the benefits from reduced billing exceptions. Provide all calculations, assumptions, workpapers, and other materials used to develop your answer.
- f) Is PSE willing to commit to reductions in the revenue requirement equal to the amount of the reduced billing exception benefit estimate? If not, why not?

Response:

Puget Sound Energy ("PSE") provides the following in response to Public Counsel Data Request No. 274.

- a) The AMI Business Case, Appendix A of the Third Exhibit of the Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-4, pages 30-31, estimates benefits that may be achievable for remote disconnects for move in/move outs. Calculations are included in Appendix G of the Third Exhibit of the Prefiled Direct Testimony of Catherine A. Koch, tab "GTZ RC DC Cost Benefit". Appendix A

characterizes these Advanced Metering Infrastructure (“AMI”) benefits as related to the Get to Zero (“GTZ”) program. Remote disconnect benefits and costs, including those for move in/move outs, were refined through the GTZ program as provided in PSE’s Response to The Energy Project Data Request Nos. 014 and 030.

- b) No, PSE is not willing to commit to reductions in the revenue requirement for the benefit from AMI investment associated with remote disconnect and reconnect as these benefits are not quantifiable at this time. The Washington Utilities and Transportation Commission AMI Rulemaking, Docket U-180525, is ongoing and requirements that may affect benefits that can be realized from AMI for remote disconnect and reconnect are yet to be concluded. These elements are outside of PSE’s control and can directly impact the level of benefits received. Therefore, it is not appropriate to commit to benefits that are not quantifiable at this time.
- c) PSE discussed potential non-monetized demand response benefits in the AMI Business Case, Appendix A of the Third Exhibit of the Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-4, page 9. PSE did not estimate them as stated in the AMI Business Case because “PSE lacks empirical and/or industry data required for robust quantification.” PSE is not prepared to estimate these benefits until the program pilots are developed to support this estimation.
- d) PSE’s next IRP, as previous ones have, will consider resources including demand response based on a broad set of factors and criteria that support the long term supply need in alignment with developing CETA rules and plans.
- e) PSE discussed potential benefits associated with non-monetized billing exceptions in the AMI Business Case, Appendix A of the Third Exhibit of the Prefiled Direct Testimony of Catherine A. Koch, Exh. CAK-4, page 9. PSE did not estimate them for reasons provided in PSE’s response to subpart (c). PSE is not prepared to estimate these benefits until the AMI transition is near completion and new operational processes support the estimation of this benefit.
- f) The benefits associated with reduced billing exceptions were non-monetized benefits and were presented in the qualitative section of the business case. PSE is not able to quantify these benefits at this time and, therefore, PSE is not willing to commit to reductions in the revenue requirement for AMI associated with unquantified benefits.