

**EXH. CD-6
DOCKETS UE-22 ___/UG-22 ___
2022 PSE GENERAL RATE CASE
WITNESS: DR. CHHANDITA DAS**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE-22 ___
Docket UG-22 ___**

**FIFTH EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED DIRECT TESTIMONY OF**

DR. CHHANDITA DAS

ON BEHALF OF PUGET SOUND ENERGY

JANUARY 31, 2022

2017 Net Metering Load Research Sample Design and Deployment

Puget Sound Energy (PSE) selected and deployed its net metering customer class load research samples in December 2017. The number of net metering customers has been growing continuously and 5,676 net metering accounts were served by PSE by the end of April 2017. Among those accounts, only 4,878 accounts had a full 12-month billing history. Some of the net metering customers have a single account for energy delivered and returned but multiple accounts for production meters. Therefore, the number of customers eligible for sampling was reduced further to 4,681 after those multiple accounts were aggregated for the same customer. Among them, there were 65 non-core net metering customers classified into Solar/Wind Hybrid, Wind, and Community Solar Generation segments. The samples for each non-core segment were selected manually based on individual customers' billing data so that the resulting sample distribution would be similar to the segment population distribution. Excluding those 65 non-core net metering customers, 397 customers were sampled from the population of 4,616 net metering customers to collect their 15-minute interval load data for the amount of electric energy produced by customer, the amount delivered by PSE to customer and the amount returned by customer to PSE. 186 of those 397 sampled customers were selected on the basis of annual amount of energy delivered, while the remaining 211 customers were sampled on the basis of annual amount returned. The new samples have been producing 15-minute interval load data since January 1, 2018 and will be monitored regularly for their reliability.

The following sections discuss the customer and billing data analyzed for sampling, the statistical methods and analyses performed for sample design, and the initial and final sampling results.

Data

The monthly billing data of net metering customers for the twelve-month period ending April 2017 were analyzed and evaluated to develop a sample design. The purpose of sample design was to draw unbiased samples to collect their 15-minute interval load data for the net metering customer class load profiling.

Statistical Methods and Analyses

A net metering customer is viewed as not only a consumer PSE is obligated to serve but also PSE's potential power supplier. Therefore, the sample design for net metering load research was developed in two ways, using two different criteria: (1) annual total energy delivered by PSE and (2) annual total energy returned to PSE. The net metering class was segmented into nine different customer groups:

- 1) Residential (Rate Schedule 07) Solar with Battery Storage,
- 2) Small General Service (Rate Schedule 24) Solar with Battery Storage,
- 3) Residential Solar with no Battery Storage,
- 4) Small General Service Solar with no Battery Storage,
- 5) Medium General Service (Rate Schedule 25) Solar,
- 6) Large General Service (Rate Schedule 26) Solar,
- 7) Residential Wind,
- 8) Residential Solar/Wind Hybrid, and
- 9) Community Solar.

Since the samples for Customer Segments #5 through #9 were selected manually by analyzing the customers' billing data to simulate the segment population distribution, sample designs were developed only for Customer Segments #1 through #4.¹

A major obstacle in developing a sample design for the net metering customer class load research is that no actual hourly load data is available for the targeted customers. The class load research sample design produced in this study was developed by analyzing the population statistics of electric billing data of the net metering customers for their annual delivered and returned kWh's for a twelve-month period ending April 30, 2017. The population statistics were calculated only for the customers who were active at the end of April 2017 and had a full 12-month history of billings. A stratified Mean per Unit (MPU) estimation approach was adopted for the net metering load research sample design. The MPU approach assumes a strong positive correlation between hourly loads and annual kWh's across the net metering customers.

To perform a stratified sampling for each of the four customer segments, population data of customers and their annual delivered (or returned) kWh volumes in each segment were sorted by their relative sizes of annual delivered (or returned) kWh volumes. In each case of sample design, a frequency table was created by assigning the customers into appropriate kWh brackets. The number and ranges of kWh brackets were pre-defined on the basis of population size and density of its kWh distribution. The frequency table was then stratified by 3 to 4 groups by combining the kWh brackets and their frequencies. For efficiency and practicality, the most popular numbers of strata being used for a stratified sampling are 2 to 5. For the number of strata set for each of the customer segments, strata boundaries were determined following the Dalenius-Hodges (DH) procedure, also known as the cumulative square root of (uf) procedure where "u" denotes kWh width of a given usage bracket and "f" stands for frequency of the usage bracket. In the DH procedure, strata boundaries are set to have each of the strata yield a similar sum of square-rooted kWh values of (uf).

The Neyman Optimum Allocation formula was then used to calculate total number of sample units for each customer segment and the strata sample sizes. The Neyman Allocation formula estimates total and strata sample sizes required for a given error margin and confidence limit on the basis of the population statistics of number of customers and their kWh use. For each customer segment, total and strata sample sizes were determined by using the following formulae:

$$n = (\sum W_h S_h)^2 / ((d/t)^2 + 1/N * \sum W_h S_h^2)$$

$$n_h = n * (W_h * S_h) / \sum (W_h * S_h)$$

Where N = Total Population size

N_h = Stratum population size

n = Total sample size

n_h = Stratum sample size

W_h = N_h/N

S_h = Stratum standard deviation of annual kWh use

d = Tolerable error margin; and

¹ There were 12 solar customers under Rate Schedule 25, 1 solar customer under Rate Schedule 26, 24 residential wind customers, 11 residential solar/wind hybrid customers, and 17 community solar customers. 9 Rate Schedule 25 customers, 1 Rate Schedule 26 customer, 8 Wind customers, 5 Solar/Wind Hybrid customers, and 15 Community Solar customers were sampled to produce 15-minute interval load readings. However, eight of those customers had meter performance issues and had to be dropped from the final list of the net metering customers selected for 15-minute interval load reading. Therefore, the final sample sizes are 6 for Rate Schedule 25, none for Rate Schedule 26, 6 for Wind, 4 for Hybrid, and 13 for Community Solar.

t = t-statistic value for pre-set confidence limit

The examples presented below illustrate how the stratified sample sizes were determined for the “Delivered kWh” case of the “Residential Solar with no Battery Storage” customer segment through the two-step procedure explained above. The first step was to set strata boundaries through the DH procedure. At the beginning, all of the net metering customers in the targeted customer segment were sorted by sizes of their annual kWh delivered. A frequency table was created by counting the number of usage points (f) sorted to each of the kWh brackets ascending with an increment (u) of 2,500 kWh. The sum of square rooted value of (uf) for all of the usage brackets was 10,866 kWh. The number of strata set for sampling was 4. The strata boundaries were then determined by making the cut-offs so that all of the four strata yield a sum of square rooted (uf) close to one fourth of 10,866 kWh. The strata boundaries set for the “Residential Solar with no Battery Storage” sample design were 0 – 7,500 kWh for the first stratum, 7,501 – 12,500 kWh for the second, 12,501 – 25,000 kWh for the third, and all of the customers with annual usage over 25,000 kWh assigned to the fourth stratum.

Step 1

Dalenius-Hodges Procedure

| Load Profile | Bracket Lower | Bracket Upper | Frequency (f) | u | uf | sqrt(uf) | Cum sqrt(uf) | % Distribution by Stratum |
|---------------------------------|---------------|---------------|---------------|-------|-----------|----------|--------------|---------------------------|
| Residential Solar PV No Storage | 0 | 2500 | 95 | 2,500 | 237,500 | 487 | 487 | |
| Residential Solar PV No Storage | 2501 | 5000 | 655 | 2,500 | 1,637,500 | 1,280 | 1,767 | |
| Residential Solar PV No Storage | 5001 | 7500 | 824 | 2,500 | 2,060,000 | 1,435 | 3,202 | 37.2% |
| Residential Solar PV No Storage | 7501 | 10000 | 693 | 2,500 | 1,732,500 | 1,316 | 4,519 | |
| Residential Solar PV No Storage | 10001 | 12500 | 550 | 2,500 | 1,375,000 | 1,173 | 5,691 | 29.4% |
| Residential Solar PV No Storage | 12501 | 15000 | 381 | 2,500 | 952,500 | 976 | 6,667 | |
| Residential Solar PV No Storage | 15001 | 20000 | 531 | 2,500 | 1,327,500 | 1,152 | 7,819 | |
| Residential Solar PV No Storage | 20001 | 25000 | 239 | 2,500 | 597,500 | 773 | 8,592 | 27.2% |
| Residential Solar PV No Storage | 25001 | 30000 | 112 | 2,500 | 280,000 | 529 | 9,121 | |
| Residential Solar PV No Storage | 30001 | 35000 | 58 | 2,500 | 145,000 | 381 | 9,502 | |
| Residential Solar PV No Storage | 35001 | 40000 | 31 | 2,500 | 77,500 | 278 | 9,781 | |
| Residential Solar PV No Storage | 40001 | 45000 | 14 | 2,500 | 35,000 | 187 | 9,968 | |
| Residential Solar PV No Storage | 45001 | 50000 | 10 | 2,500 | 25,000 | 158 | 10,126 | |
| Residential Solar PV No Storage | 50001 | 55000 | 9 | 2,500 | 22,500 | 150 | 10,276 | |
| Residential Solar PV No Storage | 55001 | 60000 | 5 | 2,500 | 12,500 | 112 | 10,388 | |
| Residential Solar PV No Storage | 60001 | 65000 | 8 | 2,500 | 20,000 | 141 | 10,529 | |
| Residential Solar PV No Storage | 65001 | 70000 | 4 | 2,500 | 10,000 | 100 | 10,629 | |
| Residential Solar PV No Storage | 70001 | 75000 | 3 | 2,500 | 7,500 | 87 | 10,716 | |
| Residential Solar PV No Storage | 75001 | 80000 | 2 | 2,500 | 5,000 | 71 | 10,786 | |
| Residential Solar PV No Storage | 80001 | 85000 | 0 | 2,500 | 0 | 0 | 10,786 | |
| Residential Solar PV No Storage | 85001 | 90000 | 0 | 2,500 | 0 | 0 | 10,786 | |
| Residential Solar PV No Storage | 90001 | 100000 | 1 | 2,500 | 2,500 | 50 | 10,836 | |
| Residential Solar PV No Storage | 100001 | 110000 | 0 | 2,500 | 0 | 0 | 10,836 | |
| Residential Solar PV No Storage | 110001 | 120000 | 0 | 2,500 | 0 | 0 | 10,836 | |
| Residential Solar PV No Storage | 120001 | 130000 | 0 | 2,500 | 0 | 0 | 10,836 | |
| Residential Solar PV No Storage | 130001 | 140000 | 0 | 2,500 | 0 | 0 | 10,836 | |
| Residential Solar PV No Storage | 140001 | 150000 | 1 | 2,500 | 2,500 | 50 | 10,886 | 6.1% |
| Residential Solar PV No Storage | Total | | 4,226 | | | | | 100% |

2,722 4 =Number of Strata

2,722 1 Stratum 1

5,443 2 Stratum 2

8,165 3 Stratum 3

10,886 4 Stratum 4

The second step was to calculate the minimum number of samples required to meet the sample design criteria of 5% error margin with 95% confidence limit for each residential rate schedule and to allocate the total number of

samples to each stratum. The example provided below illustrates how the population statistics of customers and their annual kWh delivered by PSE were used in the Neyman Optimum Allocation formula to determine the customer segment total and strata sample sizes. The components of the formula calculated with the population statistics are shown in columns of the tables provided below. The final results for the customer segment total and strata sample sizes are presented in column “n(h).”

Step 2

Neyman Allocation for Stratified Sampling
(Total Sample Size Required for 5% Error Margin @ 95% Confidence Limit)

RC 7- Solar PV No Storage

| <u>Min</u> | <u>Max</u> | <u>N(h)</u> | <u>W(h)</u> | <u>Y(h)</u> | <u>S(h)</u> | <u>W(h)*S(h)</u> | <u>n(h)</u> | <u>S(h)^2</u> | <u>W(h)*S(h)^2</u> |
|--------------|------------|-------------|-------------|-------------|-------------|------------------|-------------|---------------|--------------------|
| 0 | 7500 | 1,574 | 0.3725 | 5,004 | 1,539 | 573 | 17 | 2,369,549 | 882,553 |
| 7501 | 12500 | 1,243 | 0.2941 | 9,792 | 1,452 | 427 | 13 | 2,107,470 | 619,873 |
| 12501 | 25000 | 1,151 | 0.2724 | 17,082 | 3,351 | 913 | 28 | 11,226,977 | 3,057,797 |
| 25001 | 150000 | 258 | 0.0611 | 35,870 | 13,850 | 846 | 26 | 191,824,709 | 11,711,021 |
| Total | | 4,226 | 1.0000 | 11,586 | 8,805 | 2,758 | 84 | | 16,271,245 |

Total sample size required = 83
(@ 5% error margin w/ 95% confidence limit)

Note: While the statistically-required minimum sample size is 83, the final sample size is set to be 84 due to rounding.

Sample Design

As illustrated above for the “Residential Solar with no Battery Storage” sample design, use of the Dalenius-Hodges procedure and the Neyman Optimum Allocation method produced the following sample designs with 5% error tolerance at 95% confidence limit for each of the delivered kWh and the returned kWh cases by customer segment:

Delivered kWh Case

| RC 7- Solar PV No Storage | | | | RC 7- Solar PV Yes Storage | | | |
|----------------------------------|----------------|-------------|-------------|-----------------------------------|----------------|-------------|-------------|
| <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> | <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> |
| 0 | 7,500 | 1,574 | 17 | 0 | 7,500 | 30 | 3 |
| 7,501 | 12,500 | 1,243 | 13 | 7,501 | 20,000 | 61 | 14 |
| 12,501 | 25,000 | 1,151 | 28 | 20,001 | 170,000 | 21 | 21 |
| 25,001 | 150,000 | 258 | 26 | Total | | 112 | 38 |
| Total | | 4,226 | 84 | | | | |

| RC 24 - Solar PV No Storage | | | | RC 24- Solar PV Yes Storage | | | |
|------------------------------------|----------------|-------------|-------------|------------------------------------|----------------|-------------|-------------|
| <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> | <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> |
| 0 | 12,500 | 70 | 6 | 0 | 7,500 | 5 | 2 |
| 12,501 | 30,000 | 99 | 13 | 7,501 | 25,000 | 6 | 2 |
| 30,001 | 60,000 | 57 | 13 | 25,001 | 200,000 | 4 | 1 |
| 60,001 | 220,000 | 37 | 35 | Total | | 15 | 5 |
| Total | | 263 | 67 | | | | |

Returned kWh Case

| RC 7- Solar PV No Storage | | | | RC 7- Solar PV Yes Storage | | | |
|----------------------------------|----------------|-------------|-------------|-----------------------------------|----------------|-------------|-------------|
| <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> | <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> |
| 0 | 2,000 | 1,394 | 22 | 0 | 1,000 | 47 | 6 |
| 2,001 | 4,000 | 1,358 | 21 | 1,001 | 4,000 | 52 | 20 |
| 4,001 | 7,000 | 1,191 | 26 | 4,001 | 14,000 | 13 | 13 |
| 7,001 | 32,000 | 283 | 34 | | | | |
| Total | | 4,226 | 103 | Total | | 112 | 39 |

| RC 24 - Solar PV No Storage | | | | RC 24- Solar PV Yes Storage | | | |
|------------------------------------|----------------|-------------|-------------|------------------------------------|----------------|-------------|-------------|
| <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> | <u>Min kWh</u> | <u>Max kWh</u> | <u>N(h)</u> | <u>n(h)</u> |
| 0 | 1,250 | 77 | 4 | 0 | 1,500 | 5 | 4 |
| 1,251 | 4,500 | 80 | 12 | 1,501 | 4,000 | 5 | 4 |
| 4,501 | 9,500 | 73 | 17 | 4,001 | 8,000 | 5 | 4 |
| 9,501 | 38,500 | 33 | 33 | | | | |
| Total | | 263 | 66 | Total | | 15 | 12 |

Sample Drawing

A systematic sampling technique was used to draw the samples for each stratum of the targeted customer segment. The following procedures were followed to select the samples from the segment population list of customers and their annual billing data:

- 1) Sort the population in ascending order of annual delivered (or returned) kWh and stratify the sorted data by the same kWh strata as was determined in the sample design.
- 2) Count the number of customers in each kWh bracket (or stratum).
- 3) Calculate $K = N_h/n_h$ where N_h = population number of customers in stratum h and n_h = number of samples as required by the sample design for stratum h.
- 4) Draw stratum samples by taking the $(K/2)^{th}$ customer from the top of the stratum population list as the first sample and every k^{th} customer from the first and the samples drawn in sequence until the total number of samples drawn reaches the number of sampling units determined in the sample design.
- 5) Repeat 3) and 4) to draw the samples for the remaining strata.

Taking the “Delivered kWh” case of the “Residential Solar with no Battery Storage” customer segment as an example, the table below illustrates how the samples were drawn:

Sample Selection

RC 7- Solar PV No Storage

| <u>Min</u> | <u>Max</u> | <u>N(h)</u> | <u>n(h)</u> | <u>N(h)/n(h)</u> | <u>1st Sample</u> | <u>Obs. # for 1st Sample</u> | <u>Obs. # for Last Sample</u> |
|--------------|------------|-------------|-------------|------------------|-------------------|------------------------------|-------------------------------|
| 0 | 7500 | 1574 | 17 | 93 | 46 | 46 | 1,527 |
| 7501 | 12500 | 1243 | 13 | 96 | 48 | 1,622 | 2,769 |
| 12501 | 25000 | 1151 | 28 | 41 | 21 | 2,838 | 3,948 |
| 25001 | 150000 | 258 | 26 | 10 | 5 | 3,973 | 4,221 |
| Total | | 4,226 | 84 | | | | |

Sample Validation

The samples drawn for each of the customer segment were checked against any expected problems with their meter reading and data communication capabilities by evaluating the quality of their previous daily meter readings. When a significant problem was detected, the corresponding sample was replaced with a customer in the same customer segment whose annual amount of delivered (or returned) kWh is similar to the original sample customer's. When an appropriate replacement is not available, the original sample with meter reading problems was simply dropped out of the final sample list. Once the sample list was revised, statistical representation of the final samples was validated by evaluating the percentage difference of sample mean from population mean. The tables provided below list the final sample size and the sample mean percentage difference by kWh bracket and customer segment for the delivered kWh and the returned kWh cases:

Validation of Samples Selected for Delivered kWh Case

| Residential Return No Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|-------------------------------|------------------|--------------|---------------|-----------------|--------------|
| 0-2000 | 1,574 | 17 | 5,004 | 5,002 | -0.04% |
| 2001-4000 | 1,243 | 13 | 9,792 | 9,788 | -0.04% |
| 4001-7000 | 1,151 | 27 | 17,082 | 17,234 | 0.89% |
| 7001-32000 | 258 | 26 | 35,870 | 35,351 | -1.45% |
| Total | 4,226 | 83 | 11,586 | 11,594 | 0.07% |

| Residential Return Yes Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|--------------------------------|------------------|--------------|---------------|-----------------|--------------|
| 0-1000 | 30 | 3 | 5,360 | 5,351 | -0.16% |
| 1001-4000 | 61 | 13 | 12,655 | 11,983 | -5.31% |
| 4001-14000 | 21 | 18 | 45,165 | 42,250 | -6.45% |
| Total | 112 | 34 | 16,797 | 15,882 | -5.45% |

| Commercial Return No Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|------------------------------|------------------|--------------|---------------|-----------------|--------------|
| 0-1250 | 70 | 6 | 5,789 | 5,652 | -2.36% |
| 1251-4500 | 99 | 13 | 20,854 | 20,706 | -0.71% |
| 4501-9500 | 57 | 13 | 41,324 | 40,792 | -1.29% |
| 9501-38500 | 37 | 32 | 96,174 | 97,552 | 1.43% |
| Total | 263 | 64 | 31,877 | 31,863 | -0.04% |

| Commercial Return Yes Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|-------------------------------|------------------|--------------|---------------|-----------------|--------------|
| 0-1500 | 5 | 2 | 4,812 | 5,051 | 4.98% |
| 1501-4000 | 6 | 2 | 15,866 | 15,831 | -0.22% |
| 4001-8000 | 4 | 1 | 79,371 | 70,360 | -11.35% |
| Total | 15 | 5 | 29,116 | 26,779 | -8.03% |

Total Number of Samples for Delivered kWh Case **186**

Validation of Samples Selected for Returned kWh Case

| Residential Return No Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|-------------------------------|------------------|--------------|---------------|-----------------|---------------|
| 0-2000 | 1,394 | 22 | 978 | 976 | -0.18% |
| 2001-4000 | 1,358 | 21 | 2,962 | 2,958 | -0.11% |
| 4001-7000 | 1,191 | 26 | 5,240 | 5,235 | -0.09% |
| 7001-32000 | 283 | 34 | 10,235 | 10,043 | -1.87% |
| Total | 4,226 | 103 | 3,437 | 3,421 | -0.46% |

| Residential Return Yes Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|--------------------------------|------------------|--------------|---------------|-----------------|---------------|
| 0-1000 | 47 | 6 | 369 | 365 | -1.20% |
| 1001-4000 | 52 | 20 | 2,068 | 1,977 | -4.39% |
| 4001-14000 | 13 | 11 | 6,207 | 6,020 | -3.01% |
| Total | 112 | 37 | 1,835 | 1,770 | -3.58% |

| Commercial Return No Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|------------------------------|------------------|--------------|---------------|-----------------|---------------|
| 0-1250 | 77 | 4 | 293 | 278 | -5.20% |
| 1251-4500 | 80 | 12 | 2,864 | 2,800 | -2.25% |
| 4501-9500 | 73 | 17 | 6,635 | 6,552 | -1.25% |
| 9501-38500 | 33 | 27 | 16,954 | 16,293 | -3.90% |
| Total | 263 | 60 | 4,926 | 4,796 | -2.64% |

| Commercial Return Yes Battery | Population Count | Sample Count | Pop. Mean kWh | Sample Mean kWh | % Difference |
|-------------------------------|------------------|--------------|---------------|-----------------|---------------|
| 0-1500 | 5 | 4 | 384 | 480 | 25.00% |
| 1501-4000 | 5 | 3 | 2,346 | 2,569 | 9.51% |
| 4001-8000 | 5 | 4 | 6,030 | 5,678 | -5.83% |
| Total | 15 | 11 | 2,920 | 2,909 | -0.37% |

Total Number of Samples for Returned kWh Case **211**

For two customer segments in the delivered kWh case where the population size is small and the kWh variances are high, the total sample mean difference from the population mean is greater than $\pm 5\%$ of the error tolerance limit set initially for sample design. Since the error margins calculated for most of the customer segments and the kWh brackets are well below the $\pm 5\%$ limit and there is no easy solution to remove the sampling bias remained in those few brackets, the sample lists were finalized and were sent to Landis & Gyr and PSE's Meter Data Warehouse (MDW) for deployment. In the future, it may be considered to take the whole population, instead of sampling, for some of those problem kWh brackets where the population size is so small and is not much larger than the required sample size.