



# PUGET SOUND ENERGY

*The Energy To Do Great Things*

Puget Sound Energy  
P.O. Box 97034  
Bellevue, WA 98009-9734  
PSE.com

March 31, 2011

## VIA ELECTRONIC FILING AND REGULAR MAIL

Mr. David Danner, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250

### **Re: PSE Service Quality Program and Electric Service Reliability Annual Filing Docket Nos. UE-072300 and UG-072301**

Dear Mr. Danner:

Pursuant to Order 17 of consolidated Docket Nos. UE-072300 and UG-072301 ("Order 17"), Puget Sound Energy, Inc. ("PSE") provides an original and twelve copies of PSE's Service Quality Program and Electric Service Reliability Filing for the twelve-month period ending December 31, 2010.

Attachment A, 2010 Annual Puget Sound Energy SQI and Electric Service Reliability Report, includes the Service Quality Indices ("SQI") performance results and the electric service reliability results for 2010. The annual reporting of the Service Quality Program and the electric service reliability had been filed separately about February 15 and March 31 of each year prior to 2011, respectively. The UTC granted PSE's petition to combine these two reporting requirements in Order 17 on November 29, 2010.

The SQI section of Attachment A details the service quality performance of PSE and its service providers. This section reflects all modifications and requirements stipulated in various SQI settlements, except PSE's gas emergency response plans for outlying areas, which are filed as Attachment C to this filing due to the confidential information contained in the plans. In addition to the SQI performance results, PSE also provides supplemental information on each index including background, unique events which may have influenced PSE's achievement level, the environment in which PSE operated, and the actions PSE has taken or will be taking to improve performance.

The electric service reliability section of Attachment A meets all the Washington State electric service reliability monitoring and reporting requirements of WAC 480-100-388, WAC 480-100-393, and WAC 480-100-398. The information contained in this section is also consistent with PSE's Electric Service Reliability Monitoring and Reporting Plan approved by the Commission in Docket No. UE-110060. In preparation of this filing, PSE also initiated several communications to the Commission staff (the "Staff") and the representatives of Public Counsel (the "Public Counsel") to get their comments and suggestions regarding the format and content of the annual electric service reliability reporting as prescribed in Order 12 of

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Docket Nos. UE-072300 and UG-072301 ("Order 12"). Staff's suggestions have been incorporated in Attachment A.

A proposed customer report card that outlines PSE's 2010 performance of the nine SQI and associated benchmarks is included as Appendix D in Attachment A. PSE intends to provide customers the final SQI customer report card with its billings by June 29, 2011, after consultation with the Staff and the Public Counsel.

SQI No. 7 Benchmark Evaluation Report, Attachment B to this filing, is a one-time requirement for the 2010 SQI performance year in accordance with Order 12. In this report, PSE evaluated the costs, customer impacts, and the safety implications of changing the current SQI No. 7 Gas Response Time benchmark to a different performance standard. Based on the results of the evaluation, PSE concluded that the existing benchmark should be continued as changing the performance standard does not guarantee improvements in customer safety or customer satisfaction but would incur additional costs. On October 22, 2010, PSE sent a draft report that summarized its finding and analyses to the parties who entered into the Service Quality program settlement stipulation in Order 12; Commission Staff, the Energy Project, and Public Counsel; for their consultation in accordance with Order 12. The Staff responded on December 1, 2010, that the current SQI No. 7 benchmark should be retained as there is "no meaningful safety benefit to changing the benchmark".

Attachment C to this filing, part of the Service Quality Program requirements, contains PSE's Gas Emergency Response Plans for the following outlying areas: Centralia/Chehalis, Kittitas County, Toledo, Vashon Island, Winlock, and Sumas Generating Station and Pipeline. Confidential information has been redacted for security purposes. These plans are available for viewing without redaction at the PSE's headquarter in Bellevue, Washington.

Please contact Mei Cass at (425) 462-3800 or [mei.cass@pse.com](mailto:mei.cass@pse.com) for additional information about this filing. If you have any other questions, please contact me at (425) 462-3495.

Sincerely,



Lynn F. Logen, Tariff Consultant

For

Tom DeBoer

Director, Federal & State Regulatory Affairs

Enclosures

cc: Deborah Reynolds – UTC  
Roger Kouchi – UTC  
Mary Kimball – Public Counsel

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**Puget Sound Energy  
2010 SQ Program and Electric Service Reliability Filing**

**Attachment A:  
2010 Annual Puget Sound Energy SQI and Electric Service Reliability Report**

**Docket Nos. UE-072300 and UG-072301**

**Puget Sound Energy  
2010 SQ Program and Electric Service Reliability Filing**

**Attachment B:  
SQI No. 7 Benchmark Evaluation Report**

**Docket Nos. UE-072300 and UG-072301**

**Puget Sound Energy  
2010 SQ Program and Electric Service Reliability Filing**

**Attachment C:  
PSE's Gas Emergency Response Plans for Outlying Areas**