

STATE OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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October 25, 2023

Birud D. Jhaveri Director, Regulatory Affairs Puget Sound Energy PO Box 97034, BEL10W Bellevue, WA 98009-9734

Re: Electric Service Reliability Monitoring and Reporting Plan pursuant to WAC 480-100-393.

Dear Birud Jhaveri:

On June 28, 2023, Puget Sound Energy (PSE) filed a 3rd modification to its annual Electric Service Reliability Monitoring and Reporting Plan (Plan) as required under WAC 480-100-393. The new plan outlines the electric service reliability information that PSE will be monitoring and providing in its annual electric service reliability reporting to comply with each section of WAC 480-100-393 and -398. The proposed plan does not set forth the exact presentation of reporting elements. The changes to the current monitoring and reporting plan include the following:

- 1. Moving the performance reporting of PSE's Service Quality Program Service Quality Index (SQI) No. 3 System Average Interruption Duration Index (SAIDI) and SQI No. 4 System Average Interruption Frequency Index (SAIFI) from Chapter 3 to Chapter 2 of the Combined Report. This also includes changing the title of Chapter 2 to "Service Quality Program". The proposed change puts all SQI performance results in the same chapter.
- 2. Moving the Customers Experiencing Multiple Interruptions (CEMI) reporting from Chapter 3 to Chapter 2. The reporting of CEMI is part of the Service Quality Program changes approved by the Commission in its Order 29 of consolidated Dockets UE-072300 and UG-072301. All PSE's Service Quality Program reporting requirements will be in Chapter 2 going forward. Chapter 3 will have all WAC 480-100-393 and -398 electric reliability monitoring and reporting requirements.

Docket UE-230522 Birud D. Jhaveri October 25, 2023 Page 2

- 3. Establishing 2014 as the new baseline year. 2014 was the first fully operational year of PSE's current Outage Management System (OMS). The outage data used in the calculation of the 2014 electric reliability performance results were all recorded in the current OMS. Furthermore, the Non-Major Event SAIDI for the calendar year of 2014 was 154 minutes which is close to PSE's SQI No.3 benchmark of 155 minutes.
- 4. Allowing for flexibility in visualization/presentation of reliability performance results. The proposed plan does not prescribe the exact presentation of reporting elements. However, figures and tables will include the applicable baseline year results to aid the evaluation of the performance result.
- 5. Enabling continuous improvement in methodologies to identify Areas of Greatest Concern. In Chapter 3 of each annual filing of the Combined Report, PSE will explain the methodology, such as reliability metric thresholds and equity considerations, used to identify the areas of greatest concern for the year. Under the current Docket UE-110060 Electric Reliability Monitoring and Reporting Plan, the Areas of Greatest Concern metric is based on a 5-year average rank of overall circuit performance of customer minute interruptions. Going forward, PSE will incorporate new reliability metrics, equity, and other considerations in identifying Areas of Greatest concern. This proposal is in line with WAC 480-100-398(3) "Electric service reliability reports", which provides that:
 - (3) The report must identify the utility's geographic areas of greatest reliability concern, explain their causes, and explain how the utility plans to address them.

The proposed Plan has been discussed with the Commission staff. It is expected to produce annual electric system reliability reports that continue to provide accurate, timely information on customer service reliability. PSE's modified electric reliability monitoring and reporting plan is deemed consistent with WAC 480-100-393 and is accepted by the Commission.

Questions about the contents of this letter should be addressed to Sofya Atitsogbe at sofya.atitsogbe@utc.wa.gov or 360-664-1255.

Sincerely,

Kathy Hunter

Acting Executive Director and Secretary

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