BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	
Complainant,	
v.	**Docket UE-240004** **Docket UG-240005**
PUGET SOUND ENERGY,	
Respondent.	

THIRD EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED DIRECT TESTIMONY OF

BRIAN E. FELLON

ON BEHALF OF PUGET SOUND ENERGY

FEBRUARY 15, 2024

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Software

Corporate Spending Authorization (CSA)

Date Created:	Friday, February 10, 2023
Discretionary/ Non-Discretionary:	Non-Discretionary
Multi Year Rate Plan:	Programmatic
Equity Impact:	Yes
Strategic Alignment:	Operate the Business-Reliability
Estimated In-Service Date:	Sunday, December 31, 2028

Current State (Business Need):

IT Applications' operational work will ensure the ~300 key and critical business applications in production and supported by IT are kept technically current and properly maintained in compliance with our vendor support agreements. Work under the IT Ops - Technology Reliability - Software category is funded annually, with proposals submitted from IT teams. The IT leadership team reviews and makes funding decisions based on business value and risk of each proposal.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Software

Corporate Spending Authorization (CSA)

Desired State (Proposed Solution):

This CSA funds non-discretionary capital efforts required to upgrade and maintain key and critical IT application platforms such as the Energy Management System, Gas Control System, Outage Management System, SAP systems (Finance, Human Resources, Call Center, Billing, and Asset Management), Metering, PSE.com, among many other critical business systems, and to ensure ongoing availability, stability, security, technical currency and vendor support.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Software

Corporate Spending Authorization (CSA)

Outcome/Results (What are the anticipated benefits):	By keeping PSE's IT systems at supported versions, this ensures that PSE's IT will continue to receive critical patches from vendors, be able to take advantage of the latest features and keeps IT assets at acceptable license levels as defined by vendor support agreements. This will help improve continuity and enable IT to deliver more reliable service to the business.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Software

Corporate Spending Authorization (CSA)

Dependencies:	Yes

Dependencies comment:	None.

Escalation Included:	No, escalation has not been included.

Total Estimated Costs:	$64,271,700

Estimated Five Year Allocation:

Funds Type	ID	Line Item Description	Previous Years Actuals	Fiscal 2024 Requested	Fiscal 2025 Requested	Fiscal 2026 Requested	Fiscal 2027 Requested	Fiscal 2028 Requested
Capital	PRJ_000523	IT Ops - Technology reliability - Software	$ -	$ 10,447,338	$ 9,800,000	$ 8,718,098	$ 8,700,000	$ 10,500,000
*Amounts do not include escalator								

Incremental O&M:	No

Qualitative Benefits:

By keeping PSE's IT systems at supported versions, this ensures that PSE's IT will continue to receive critical patches from vendors, be able to take advantage of the latest features and keeps IT assets at acceptable license levels as defined by vendor support agreements. This will help improve continuity and enable IT to deliver more reliable service to the business.

Quantitative Benefits:

Quantitative Benefits	Benefit Type	Previous Years	Fiscal 2023	Fiscal 2024	Fiscal 2025	Fiscal 2026	Fiscal 2027	Fiscal 2028	Remaining Costs	Life Total

Risk Summary:

None.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Software

Corporate Spending Authorization (CSA)

Change Summary:

Planning Cycle	Change Summary	Last Update Date
2022 Baseline Cycle	This CSA has been migrated into the EPPM tool at go-live as part of the Phase 1 EPPM implementation effort. The projects in this CSA were previously approved for the 2023-2027 capital plan. Please refer to the original CSA document for additional information (if available.)	2/10/2023

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Software

Corporate Spending Authorization (CSA)

Approval History:

Approved By	Date Approved
Approved by Cost Center Owner: Tamayo , Suzanne	4/7/2023
Approved by Director Sponsor: Tamayo , Suzanne	4/7/2023
Approved by Executive Sponsor: Upton , Simon	4/25/2023
CSA Status changed to Approved	4/25/2023
Approved by Cost Center Owner: Gill , Satinder	12/4/2023
Approved by Director Sponsor: Gill , Satinder	12/4/2023
Approved by Executive Sponsor: Gill , Satinder	12/4/2023
CSA Status changed to Approved	12/4/2023
Approved by Cost Center Owner: Danielson , Carolyn	1/29/2024
Approved by Director Sponsor: Fellon , Brian	1/30/2024
Approved by Director Sponsor: Danielson , Carolyn	1/30/2024
Approved by Executive Sponsor: Upton , Simon	1/30/2024
CSA Status changed to Approved	1/30/2024

PSE *PUGET SOUND ENERGY*

IT Ops - Telecom

Corporate Spending Authorization (CSA)

Date Created:	Friday, February 10, 2023
Discretionary/ Non-Discretionary:	Non-Discretionary
Multi Year Rate Plan:	Programmatic
Equity Impact:	Yes
Strategic Alignment:	Operate the Business-Reliability
Estimated In-Service Date:	Sunday, December 31, 2028

Current State (Business Need):

IT Infrastructure's Telecom teams are responsible for maintaining PSE's vast telecommunications infrastructure comprised of telephones, radio and microwaves, fiber optic cable, towers, and SCADA systems which enable telecommunications.

IT Infrastructure's operational work will ensure key and critical Telecom applications and systems supported by IT are kept technically current and maintained under vendor support. Work under the IT Ops - Telecom category is funded annually, with proposals submitted by IT Telecom teams. The IT leadership team reviews and makes funding decisions based on business value and risk of each proposal.

PSE *PUGET SOUND ENERGY*

IT Ops - Telecom

Corporate Spending Authorization (CSA)

Desired State (Proposed Solution):

This CSA funds non-discretionary efforts required to upgrade and maintain key and critical Telecom platforms and assets, and to ensure ongoing availability, stability, security, technical currency and vendor support. The infrastructure covered under this category consists of the telecommunications hardware and systems upon which critical business systems and capabilities are built. This includes the network equipment and connectivity infrastructure (fiber, radio, microwave, SCADA) that enable telecommunications throughout our service territory.

PSE *PUGET SOUND ENERGY*

IT Ops - Telecom

Corporate Spending Authorization (CSA)

**Outcome/Results
(What are the
anticipated benefits):**

By keeping PSE's IT systems at supported versions, this ensures that PSE's IT will continue to receive critical patches from vendors, be able to take advantage of the latest features and keeps IT assets at acceptable license levels as defined by vendor support agreements. This will help improve continuity and enable IT to deliver more reliable service to the business.

PSE *PUGET SOUND ENERGY*

IT Ops - Telecom

Corporate Spending Authorization (CSA)

Dependencies:	No

Dependencies comment:	None.

Escalation Included:	No, escalation has not been included.

Total Estimated Costs:	$28,587,000

Estimated Five Year Allocation:

Funds Type	ID	Line Item Description	Previous Years Actuals	Fiscal 2024 Requested	Fiscal 2025 Requested	Fiscal 2026 Requested	Fiscal 2027 Requested	Fiscal 2028 Requested
Capital	PRJ_000520	IT Ops - Telecom	$ -	$ 4,875,000	$ 4,675,000	$ 4,675,000	$ 4,220,000	$ 4,220,000
*Amounts do not include escalator								

Incremental O&M:	Both

Qualitative Benefits:

By keeping PSE's IT systems at supported versions, this ensures that PSE's IT will continue to receive critical patches from vendors, be able to take advantage of the latest features and keeps IT assets at acceptable license levels as defined by vendor support agreements. This will help improve continuity and enable IT to deliver more reliable service to the business.

Quantitative Benefits:

Quantitative Benefits	Benefit Type	Previous Years	Fiscal 2023	Fiscal 2024	Fiscal 2025	Fiscal 2026	Fiscal 2027	Fiscal 2028	Remaining Costs	Life Total

Risk Summary:

None.

PSE *PUGET SOUND ENERGY*

IT Ops - Telecom

Corporate Spending Authorization (CSA)

Change Summary:

Planning Cycle	Change Summary	Last Update Date
2022 Baseline Cycle	This CSA has been migrated into the EPPM tool at go-live as part of the Phase 1 EPPM implementation effort. The projects in this CSA were previously approved for the 2023-2027 capital plan. Please refer to the original CSA document for additional information (if available.)	2/10/2023

PSE *PUGET SOUND ENERGY*

IT Ops - Telecom

Corporate Spending Authorization (CSA)

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Approved by Executive Sponsor: Gill , Satinder	12/4/2023
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Approved by Director Sponsor: Fellon , Brian	1/30/2024
Approved by Director Sponsor: Danielson , Carolyn	1/30/2024
Approved by Executive Sponsor: Upton , Simon	1/30/2024
CSA Status changed to Approved	1/30/2024

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Hardware

Corporate Spending Authorization (CSA)

Date Created:	Friday, February 10, 2023
Discretionary/ Non-Discretionary:	Non-Discretionary
Multi Year Rate Plan:	Programmatic
Equity Impact:	Yes
Strategic Alignment:	Operate the Business-Reliability
Estimated In-Service Date:	Sunday, December 31, 2028

Current State (Business Need): IT Infrastructure's operational work will ensure key and critical hardware and systems supported by IT are kept technically current and maintained under vendor support. Work under the IT Ops - Technology Reliability - Hardware category is funded annually, with proposals submitted by IT Teams. The IT leadership team reviews and makes funding decisions based on business value and risk of each proposal.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Hardware

Corporate Spending Authorization (CSA)

Desired State (Proposed Solution):

This CSA funds non-discretionary efforts required to upgrade and maintain key and critical infrastructure platforms and assets, and to ensure ongoing availability, stability, security, technical currency and vendor support. The infrastructure covered under this category consists of the computing hardware upon which critical business systems and capabilities are built. This includes the IT equipment housed in our Data Centers (~2,700 servers, batteries, etc.), end user devices, such as laptops, all corporate network related systems and hardware, and other required hardware upgrades, enhancements and end-of-life replacements.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Hardware

Corporate Spending Authorization (CSA)

Outcome/Results (What are the anticipated benefits):	By keeping PSE's IT systems at supported versions, this ensures that PSE's IT will continue to receive critical patches from vendors, be able to take advantage of the latest features and keeps IT assets at acceptable license levels as defined by vendor support agreements. This will help improve continuity and enable IT to deliver more reliable service to the business.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Hardware

Corporate Spending Authorization (CSA)

Dependencies:	Yes
Dependencies comment:	None.
Escalation Included:	No, escalation has not been included.
Total Estimated Costs:	$31,047,010

Estimated Five Year Allocation:

Funds Type	ID	Line Item Description	Previous Years Actuals	Fiscal 2024 Requested	Fiscal 2025 Requested	Fiscal 2026 Requested	Fiscal 2027 Requested	Fiscal 2028 Requested
Capital	PRJ_000519	IT Ops - Technology reliability - Hardware	$ -	$ 5,655,000	$ 5,655,000	$ 5,655,000	$ 5,655,000	$ 5,755,000
*Amounts do not include escalator								

Incremental O&M:	No

Qualitative Benefits:

By keeping PSE's IT systems at supported versions, this ensures that PSE's IT will continue to receive critical patches from vendors, be able to take advantage of the latest features and keeps IT assets at acceptable license levels as defined by vendor support agreements. This will help improve continuity and enable IT to deliver more reliable service to the business.

Quantitative Benefits:

Quantitative Benefits	Benefit Type	Previous Years	Fiscal 2023	Fiscal 2024	Fiscal 2025	Fiscal 2026	Fiscal 2027	Fiscal 2028	Remaining Costs	Life Total

Risk Summary:

None.

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Hardware

Corporate Spending Authorization (CSA)

Change Summary:

Planning Cycle	Change Summary	Last Update Date
2022 Baseline Cycle	This CSA has been migrated into the EPPM tool at go-live as part of the Phase 1 EPPM implementation effort. The projects in this CSA were previously approved for the 2023-2027 capital plan. Please refer to the original CSA document for additional information (if available.)	2/10/2023

PSE *PUGET SOUND ENERGY*

IT Ops - Technology Reliability - Hardware

Corporate Spending Authorization (CSA)

Approval History:

Approved By	Date Approved
Approved by Cost Center Owner: Tamayo , Suzanne	4/7/2023
Approved by Director Sponsor: Tamayo , Suzanne	4/7/2023
Approved by Executive Sponsor: Upton , Simon	4/25/2023
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Approved by Executive Sponsor: Gill , Satinder	12/4/2023
CSA Status changed to Approved	12/4/2023
Approved by Cost Center Owner: Danielson , Carolyn	1/29/2024
Approved by Director Sponsor: Fellon , Brian	1/30/2024
Approved by Director Sponsor: Danielson , Carolyn	1/30/2024
Approved by Executive Sponsor: Upton , Simon	1/30/2024
CSA Status changed to Approved	1/30/2024

PSE *PUGET SOUND ENERGY*

IT Ops - Running the business of IT

Corporate Spending Authorization (CSA)

Date Created:	Friday, February 10, 2023
Discretionary/ Non-Discretionary:	Non-Discretionary
Multi Year Rate Plan:	Programmatic
Equity Impact:	No
Strategic Alignment:	Evolve the Business-Operational Excellence
Estimated In-Service Date:	Sunday, December 31, 2028

Current State (Business Need):

IT provides many services that support the enterprise which requires continuous improvements and system enhancements to meet business needs, including supporting the running of IT. An example of work funded under this effort is improvements to Service Now to support critical IT Service Management and compliance processes in Service Now.

PSE *PUGET SOUND ENERGY*

IT Ops - Running the business of IT

Corporate Spending Authorization (CSA)

Desired State (Proposed Solution):

This CSA funds capital efforts that enable running the business of IT. This includes enhancements of Enterprise Architecture tool and ServiceNow, and other IT operational enhancements.

PSE *PUGET SOUND ENERGY*

IT Ops - Running the business of IT

Corporate Spending Authorization (CSA)

Outcome/Results (What are the anticipated benefits):

This allows IT to optimize its operations and processes which will help improve continuity and enable IT to deliver more reliable service to the business.

PSE *PUGET SOUND ENERGY*

IT Ops - Running the business of IT

Corporate Spending Authorization (CSA)

Dependencies:	No
Dependencies comment:	None.
Escalation Included:	No, escalation has not been included.
Total Estimated Costs:	$12,988,618

Estimated Five Year Allocation:

Funds Type	ID	Line Item Description	Previous Years Actuals	Fiscal 2024 Requested	Fiscal 2025 Requested	Fiscal 2026 Requested	Fiscal 2027 Requested	Fiscal 2028 Requested
Capital	PRJ_000518	IT Ops - Running the business of IT	$ -	$ 1,500,000	$ 1,000,000	$ 1,000,000	$ 1,000,000	$ 1,000,000
*Amounts do not include escalator								

Incremental O&M:	No

Qualitative Benefits:

This allows IT to optimize its operations and processes which will help improve continuity and enable IT to deliver more reliable service to the business.

Quantitative Benefits:

Quantitative Benefits	Benefit Type	Previous Years	Fiscal 2023	Fiscal 2024	Fiscal 2025	Fiscal 2026	Fiscal 2027	Fiscal 2028	Remaining Costs	Life Total

Risk Summary:

None.

PSE *PUGET SOUND ENERGY*

IT Ops - Running the business of IT

Corporate Spending Authorization (CSA)

Change Summary:

Planning Cycle	Change Summary	Last Update Date
2022 Baseline Cycle	This CSA has been migrated into the EPPM tool at go-live as part of the Phase 1 EPPM implementation effort. The projects in this CSA were previously approved for the 2023-2027 capital plan. Please refer to the original CSA document for additional information (if available.)	2/10/2023

PSE *PUGET SOUND ENERGY*

IT Ops - Running the business of IT

Corporate Spending Authorization (CSA)

Approval History:

Approved By	Date Approved
Approved by Cost Center Owner: Tamayo , Suzanne	4/7/2023
Approved by Director Sponsor: Tamayo , Suzanne	4/7/2023
Approved by Executive Sponsor: Upton , Simon	4/25/2023
CSA Status changed to Approved	4/25/2023
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Approved by Director Sponsor: Gill , Satinder	12/4/2023
Approved by Executive Sponsor: Gill , Satinder	12/4/2023
CSA Status changed to Approved	12/4/2023
Approved by Cost Center Owner: Danielson , Carolyn	1/29/2024
Approved by Director Sponsor: Fellon , Brian	1/30/2024
Approved by Director Sponsor: Danielson , Carolyn	1/30/2024
Approved by Executive Sponsor: Upton , Simon	1/30/2024
CSA Status changed to Approved	1/30/2024

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized IT Support Agreements

Corporate Spending Authorization (CSA)

Date Created:	Friday, February 10, 2023
Discretionary/ Non-Discretionary:	Non-Discretionary
Multi Year Rate Plan:	Programmatic
Equity Impact:	No
Strategic Alignment:	Operate the Business-Reliability
Estimated In-Service Date:	Sunday, December 31, 2028

Current State (Business Need):

This portfolio includes the allowable conversion of Opex to Capital as it relates to our Software Licensing, Maintenance and Support agreements with our vendors. IT works with Property Accounting to leverage FERC guidelines for asset capitalization and to ensure the right documentation and term agreement is in place to support any capitalization.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized IT Support Agreements

Corporate Spending Authorization (CSA)

Desired State (Proposed Solution):

This CSA will provide capital funding for the allowable capitalized portion of on-prem software assets via contractual IT support agreements.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized IT Support Agreements

Corporate Spending Authorization (CSA)

Outcome/Results (What are the anticipated benefits):

By leveraging FERC asset capitalization guidelines, PSE is able to convert a portion of O&M related to our current IT support agreements which is financially beneficial to the company.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized IT Support Agreements

Corporate Spending Authorization (CSA)

Dependencies: No

Dependencies comment: None.

Escalation Included: Yes, known and measurable escalation has been included.

Total Estimated Costs: $42,303,216

Estimated Five Year Allocation:

Funds Type	ID	Line Item Description	Previous Years Actuals	Fiscal 2024 Requested	Fiscal 2025 Requested	Fiscal 2026 Requested	Fiscal 2027 Requested	Fiscal 2028 Requested
Capital	PRJ_000522	IT Ops - Capitalized IT Support Agreements	$ -	$ 4,148,882	$ 10,223,669	$ 7,015,746	$ 9,913,541	$ 17,644,060
*Amounts do not include escalator								

Incremental O&M: No

Qualitative Benefits: By leveraging FERC asset capitalization guidelines, PSE is able to convert a portion of O&M related to our current IT support agreements which is financially beneficial to the company.

Quantitative Benefits:

Quantitative Benefits	Benefit Type	Previous Years	Fiscal 2023	Fiscal 2024	Fiscal 2025	Fiscal 2026	Fiscal 2027	Fiscal 2028	Remaining Costs	Life Total

Risk Summary: None.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized IT Support Agreements

Corporate Spending Authorization (CSA)

Change Summary:

Planning Cycle	Change Summary	Last Update Date
2022 Baseline Cycle	This CSA has been migrated into the EPPM tool at go-live as part of the Phase 1 EPPM implementation effort. The projects in this CSA were previously approved for the 2023-2027 capital plan. Please refer to the original CSA document for additional information (if available.)	2/10/2023

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized IT Support Agreements

Corporate Spending Authorization (CSA)

Approval History:

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Approved by Cost Center Owner: Tamayo , Suzanne	4/7/2023
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Approved by Cost Center Owner: Danielson , Carolyn	1/29/2024
Approved by Director Sponsor: Fellon , Brian	1/30/2024
Approved by Director Sponsor: Danielson , Carolyn	1/30/2024
Approved by Executive Sponsor: Upton , Simon	1/30/2024
CSA Status changed to Approved	1/30/2024

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized Cloud Services

Corporate Spending Authorization (CSA)

Date Created:	Friday, February 10, 2023
Discretionary/ Non-Discretionary:	Non-Discretionary
Multi Year Rate Plan:	Programmatic
Equity Impact:	No
Strategic Alignment:	Operate the Business-Reliability
Estimated In-Service Date:	Sunday, December 31, 2028

Current State (Business Need): Capitalized Cloud Services includes the capitalized portion of SaaS assets that PSE is able to capitalize due to on-prem language within the contract with the vendor that satisfies the capitalization requirement.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized Cloud Services

Corporate Spending Authorization (CSA)

Desired State (Proposed Solution):

This CSA provides funding for allowed capitalization of SaaS applications and cloud platforms. This includes enterprise-wide costs absorbed by IT such as costs associated with the ServiceNow platform, Microsoft 365 platform which provides corporate email to all PSE employees and contractors, and other applications that are used across PSE.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized Cloud Services

Corporate Spending Authorization (CSA)

Outcome/Results (What are the anticipated benefits):	By leveraging FERC guidelines for capitalization of assets, PSE is able to convert a portion of O&M related to SaaS licenses and maintenance to capital which is financially beneficial to the company.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized Cloud Services

Corporate Spending Authorization (CSA)

Dependencies:	No
Dependencies comment:	None.
Escalation Included:	Other, please describe.
Total Estimated Costs:	$38,402,913

Estimated Five Year Allocation:

Funds Type	ID	Line Item Description	Previous Years Actuals	Fiscal 2024 Requested	Fiscal 2025 Requested	Fiscal 2026 Requested	Fiscal 2027 Requested	Fiscal 2028 Requested
Capital	PRJ_000521	IT Ops - Capitalized Cloud Services	$ -	$ 1,873,214	$ 8,606,898	$ 8,478,833	$ 2,060,536	$ 9,375,562
*Amounts do not include escalator								

Incremental O&M:	No

Qualitative Benefits:

By leveraging FERC guidelines for capitalization of assets, PSE is able to convert a portion of O&M related to SaaS licenses and maintenance to capital which is financially beneficial to the company.

Quantitative Benefits:

Quantitative Benefits	Benefit Type	Previous Years	Fiscal 2023	Fiscal 2024	Fiscal 2025	Fiscal 2026	Fiscal 2027	Fiscal 2028	Remaining Costs	Life Total

Risk Summary:

None.

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized Cloud Services

Corporate Spending Authorization (CSA)

Change Summary:

Planning Cycle	Change Summary	Last Update Date
2022 Baseline Cycle	This CSA has been migrated into the EPPM tool at go-live as part of the Phase 1 EPPM implementation effort. The projects in this CSA were previously approved for the 2023-2027 capital plan. Please refer to the original CSA document for additional information (if available.)	2/10/2023

PSE *PUGET SOUND ENERGY*

IT Ops - Capitalized Cloud Services

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