EXH. MNL-4
DOCKETS UE-22___/UG-22___
2022 PSE GENERAL RATE CASE
WITNESS: MARK NEWTON LOWRY

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, **Complainant,** **v.** **PUGET SOUND ENERGY,** **Respondent.**	**Docket UE-22____** **Docket UG-22____**

THIRD EXHIBIT (NONCONFIDENTIAL) TO THE PREFILED DIRECT TESTIMONY OF

MARK NEWTON LOWRY

ON BEHALF OF PUGET SOUND ENERGY

JANUARY 31, 2022

Details of Proposed Scorecard Metrics (Excluding Unchanged SQI Metrics)

1. Modified/New Service Quality Metrics

Metric	**SAIFI Excluding IEEE-Defined Major Events Adjusted to Exclude Catastrophic Days**
Definition of the metric	System Average Interruption Frequency Index (SAIFI) indicates how often the average customer experiences a sustained interruption over a predefined period of time. This version of SAIFI excludes SQI-3 SAIDI IEEE-Defined Major Events and catastrophic events.
A brief commentary on how the metric is calculated	SAIFI would be calculated by summing all the customer interruptions, for interruptions greater than 5 minutes, for one year and dividing it by the average annual customer count. This metric excludes the same days as identified in the SQI-3 SAIDI metric: catastrophic days are replaced with average daily SAIDI in the Major Event calculation and Major Event Days are calculated and excluded as described in the IEEE standard.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported but, if approved, would also be reported in the annual service quality and reliability report.
Readily-available data (if any) for the last five historical years	Yes.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	The proposed target is based on recent historical performance.
Comments	This metric would replace the current SAIFI SQI and is calculated in the same manner as the current SAIDI SQI.

Metric	**SAIFI for Highly Impacted Communities and Vulnerable Populations, All Outages, Single Year**
Definition of the metric	System Average Interruption Frequency Index (SAIFI) indicates how often the average customer in highly impacted communities (HICs) and vulnerable populations (VPs)

	experiences a sustained interruption over a predefined period of time.
A brief commentary on how the metric is calculated	SAIFI would be calculated by summing all the customer interruptions, for interruptions greater than 5 minutes, for one year and dividing it by the average annual customer count for circuits serving HICs and VPs. No interruptions are excluded. Any circuit that serves either a VP or HIC, even if it is just one customer or one foot of distribution line, will be included in the calculation of this metric. The definitions of VPs and HICs are outlined in the Washington Administrative Code (WAC). PSE will determine the reliability performance experienced by all customers on these circuits recognizing that some customers may not meet these definitions as PSE captures reliability most readily by circuit.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported but, if approved, it would be reported in the annual service quality and reliability report.
Readily-available data (if any) for the last five historical years	Yes.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	

Metric	**SAIFI for Highly Impacted Communities and Vulnerable Populations Excluding IEEE-Defined Major Events (Adjusted to Exclude Catastrophic Days)**
Definition of the metric	System Average Interruption Frequency Index (SAIFI) indicates how often the average customer in highly impacted communities (HIC) and vulnerable populations (VP) experiences a sustained interruption over a predefined period of time. This version of SAIFI excludes SQI-3 SAIDI IEEE-Defined Major Events and catastrophic events.
A brief commentary on how the metric is calculated	SAIFI would be calculated by summing all the customer interruptions, for interruptions greater than 5 minutes, for one year and dividing it by the average annual customer count for circuits serving HICs and VPs. This metric excludes the same days as identified in SQI-3 SAIDI metric: catastrophic days are replaced with average daily SAIDI in the Major Event

	calculation and Major Event Days are calculated and excluded as described in the IEEE standard. Any circuit that serves either a VP or HIC, even if it is just one customer or one foot of distribution line, will be included in the calculation of this metric. The definitions of VPs and HICs are outlined in the Washington Administrative Code. PSE will determine the reliability performance experienced by all customers on these circuits recognizing that some customers may not meet these definitions as PSE captures reliability most readily by circuit.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported but, if approved, it would be reported in the annual service quality and reliability report.
Readily-available data (if any) for the last five historical years	Yes.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	

Metric	**SAIDI for Highly Impacted Communities and Vulnerable Populations, All Outages, Single Year**
Definition of the metric	System Average Interruption Duration Index (SAIDI) indicates the total duration of sustained interruptions for the average customer in a HIC and VP during a predefined period of time. It is commonly measured in minutes or hours of interruption.
A brief commentary on how the metric is calculated	SAIDI is calculated by summing all the customer interruption minutes, for interruptions greater than 5 minutes, for one year and dividing it by the average annual customer count for circuits serving HICs and VPs. No interruptions are excluded. Any circuit that serves either a VP or HIC, even if it is just one customer or one foot of distribution line, will be included in the calculation of this metric. The definitions of VPs and HICs are outlined in the Washington Administrative Code. PSE will determine the reliability performance experienced by all customers on these circuits recognizing that some

	customers may not meet these definitions as PSE captures reliability most readily by circuit.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported but would be reported in the annual service quality and reliability report.
Readily-available data (if any) for the last five historical years	Yes.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	

Metric	**SAIDI for Highly Impacted Communities and Vulnerable Populations Excluding IEEE-Defined Major Events (Adjusted to Exclude Catastrophic Days)**
Definition of the metric	System Average Interruption Duration Index (SAIDI) indicates the total duration of sustained interruptions for the average customer in a HIC and VP during a predefined period of time. It is commonly measured in minutes or hours of interruption. Certain interruptions are excluded from these calculations.
A brief commentary on how the metric is calculated	SAIDI is calculated by summing all the customer interruption minutes, for interruptions greater than 5 minutes, for one year and dividing it by the average annual customer count for circuits serving HICs or VPs. Catastrophic days are replaced with average daily SAIDI in the Major Event calculation and Major Event Days are calculated and excluded as described in the IEEE standard. Any circuit that serves either a VP or HIC, even if it is just one customer or one foot of distribution line, will be included in the calculation of this metric. The definitions of VPs and HICs are outlined in the Washington Administrative Code. PSE will determine the reliability performance experienced by all customers on these circuits recognizing that some customers may not meet these definitions as PSE captures reliability most readily by circuit.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported but it would be reported in the annual service quality and reliability report.
Readily-available data (if any) for the last five historical years	Yes.

Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	

2. Demand-Side Management

Metric	**Peak Load Management Savings**
Definition of the metric	The expected megawatt (MW) reduction in the Company's need for planning reserves to meet the winter coincident peak demand which is attributable to eligible demand response (DR) initiatives.
A brief commentary on how the metric is calculated	The metric encompasses the effective DR capacity of all incremental DR resources obtained in that year. The eligible DR initiatives include direct load control, curtailable or interruptible load, and pricing programs whether initiated as a result of competitive solicitations or internal Company initiatives. Costs and load savings from PSE's electric vehicle managed load program will be excluded. The reduction to the winter system peak demand is based on the expected impact of DR resources on the generation capacity required to meet the Company's planning reserves requirement, not the DR resources that are actually called upon during any particular winter.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported but it will be reported annually as part of the reports required by WAC 480-100-650 (3).
Readily-available data (if any) for the last five historical years	No.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	Targets established in CEIP beginning in 2023.
Comments	

Metric	Peak Load Management Savings Attributable to Residential Customers
Definition of the metric	The portion of the expected reduction in the Company's need for planning reserves to meet the winter peak demand which is attributable to DR initiatives for residential customers
A brief commentary on how the metric is calculated	The metric encompasses the effective DR capacity from all incremental DR resources obtained in that year from residential customers. The reduction to the winter system peak demand is based on the impact of DR resources on the generation capacity required to meet the Company's planning reserves requirement, not the DR resources that are actually called upon during any particular winter.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	No.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	

Metric	Annual Energy Efficiency Savings - Electric
Definition of the metric	First year electric energy savings from PSE energy efficiency programs measured in MWh.
A brief commentary on how the metric is calculated	For each kind of conservation measure offered by the company except grant projects and home energy reports, PSE calculates the total savings as the average savings for that measure multiplied by the total number of times that measure was implemented. These values are then summed, along with the estimated savings from voltage regulation projects, home energy reports, and grant projects to calculate the total annual energy efficiency savings.

	PSE is required to utilize the Regional Technical Forum values where possible for the average savings per conservation measure. Savings from grant projects are based on engineering calculations evaluating the change in energy use for larger single projects (e.g., a large lighting upgrade project at a hospital). Savings from home energy reports, where PSE provides customers with energy use reports and energy-saving tips, are measured through comparisons of energy use between those customers who receive home energy reports and comparison groups of customers who do not. For all programs, savings are calculated at the customer meter with a Net-to-Gross ratio of 1 per the Revised Code of Washington (RCW)/WAC.
Where is it otherwise reported by the Company and how frequently	Energy Efficiency typically reports its annual savings to the Utilities and Transportation Commission (UTC) by April of each year to align with Cost Recovery filing. Annual savings are also reported to the Commission on or before June 1 each year. In the future this metric will also be reported annually as part of the reports required by WAC 480-100-650 (3).
Readily-available data (if any) for the last five historical years	Yes.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	Targets are set in Biennial Conservation Plan proceedings.
Comments	

Metric	**Annual Energy Efficiency Savings - Gas**
Definition of the metric	First year gas energy savings from PSE energy efficiency programs measured in therms.
A brief commentary on how the metric is calculated	For each kind of conservation measure offered by the company except grant projects and home energy reports, PSE calculates the total savings as the average savings for that measure multiplied by the total number of times that measure

	was implemented. These values are then summed with the savings from grant projects and home energy reports to calculate the total annual energy efficiency savings. PSE is required to utilize the Regional Technical Forum values where possible for the average savings per conservation measure. Savings from grant projects are based on engineering calculations evaluating the change in energy use for larger single projects (e.g., a large lighting upgrade project at a hospital). Savings from home energy reports, where PSE provides customers with energy use reports and energy-saving tips, are measured by comparisons of energy use between those customers who receive home energy reports and comparison groups of customers who do not. For all programs, savings are calculated at the customer meter with a Net-to-Gross ratio of 1 per RCW/WAC.
Where is it otherwise reported by the Company and how frequently	Energy Efficiency typically reports its annual savings to the UTC by April of each year to align with Cost Recovery filing. Annual savings are also reported to the Commission on or before June 1 each year.
Readily-available data (if any) for the last five historical years	Yes.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	Targets are set in Biennial Conservation Plan proceedings.
Comments	

Metric	**Number of customers participating in gas and electric energy efficiency programs (including low-income programs) who are from highly impacted communities and vulnerable populations**
Definition of the metric	Number of distinct residential and commercial accounts that participated in at least one energy efficiency program and were in a HIC and/or VP at the time they participated.

A brief commentary on how the metric is calculated	The metric will count any customer at the contract account level, where the account received at least one energy efficiency rebate in a program where customer account data are collected during the calendar year and were in a HIC or VP at the time they participated in the rebate program. Customers who received multiple rebates in a calendar year will only be counted once. Programs that can't be tied to a specific contract account, such as lighting rebates or multi-family retrofit programs, are non-attributable to a particular census block and will not be included.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	The historical data are not readily available.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No targets are set for this metric.
Comments	HIC and VP data are currently available for electric service territory ONLY. PSE will gather data for the gas only service territory, but it will take some time to incorporate (Q1 or Q2).

3. Electric Vehicles

Metric	**Number of Light-duty Electric Vehicles in Service Territory**
Definition of the metric	Total number of light duty (battery-only or hybrid) plug-in electric vehicles (PEVs) registered in Zip Code Tabulation Areas (ZCTAs) in which PSE offers electric service
A brief commentary on how the metric is calculated	The metric is a count of the number of registered PEVs in ZCTAs served, in whole or in part, by PSE. Washington State Department of Licensing (DOL) produces a monthly data set listing all registered PEVs by ZCTA. This list can be filtered to ZCTAs where PSE offers Electric Service (even if the ZCTA is split between PSE and another electric utility). All EVs in ZCTAs served by PSE, in whole or in part, would be included in this metric. This would include PSE-owned light-duty EVs.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.

Readily-available data (if any) for the last five historical years	Historical data may be available for these years from the Washington DOL but have not been requested.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	Data for medium and heavy duty vehicles are not currently available. However, PSE will report any commercial vehicle data once available.

Metric	**Number of EV Chargers Used in Managed Load or TOU Rate Programs (Single-Family Residential)**
Definition of the metric	Total number of chargers at year end which are used in a PSE-administered load management program or a TOU rate program for single-family residential customers.
A brief commentary on how the metric is calculated	This metric is a count of chargers enrolled by single-family residential customers in PSE's EV programs and relies on data gathered by PSE. Charging facilities must be activated in order to count towards the metric. To avoid double counting between programs, unique customer account numbers will be used for the count. To the extent that PSE can gather data on eligible chargers owned by customers or third parties, those chargers would also be included.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	No.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	Proposed targets are based on PSE's estimates of the number of chargers that will be engaged in its time of use rates and EV managed load programs. Final targets will be established in its upcoming Phase I EV filing and begin in 2023. Targets are reliant on full approval of the Time Variant Rates and EV programs.
Comments	

Metric	Number of EV Chargers Used in Managed Load or TOU Rate Programs (Fleet)
Definition of the metric	Total number of chargers at year end which are used in a PSE-administered load management program.
A brief commentary on how the metric is calculated	This metric is a count of chargers enrolled by fleet customers in PSE's EV programs or time of use rates and relies on data gathered by PSE. Charging facilities must be activated in order to count towards the metric. To the extent that PSE can gather data on eligible chargers owned by customers or third parties, those chargers would also be included.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	No.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	Proposed targets are based on PSE's estimates of the number of fleet chargers that will be engaged with its EV load management programs. Final targets will be established in its upcoming Phase I EV filing and begin in 2023. Targets are reliant on full approval of EV programs.
Comments	

Metric	Number of Public Charging Ports in Highly Impacted Communities and Vulnerable Populations
Definition of the metric	Total number of public charging ports in HICs and VPs (tied to CEIP definitions)
A brief commentary on how the metric is calculated	This metric would be based on PSE's own records of EV charger installations it has undertaken. The metric would be a count of the number of EV charging ports accessible by the public in HICs and VPs.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	The historical data are not readily available and have not been gathered.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.

Comments	PSE will investigate other sources of reliable information on public EV charger installations in its service territory.

4. Greenhouse Gas Emissions

Metric	**CO2e Emissions from Company-owned Electric Operations**
Definition of the metric	Metric tons of Scope 1 CO2-equivalent emissions for PSE-owned electric generation covered in CETA
A brief commentary on how the metric is calculated	The metric is calculated as the sum of PSE's CO2-equivalent emissions from PSE-owned electric generating facilities calculated using the EPA GHG Mandatory Reporting Rule Subparts C and D calculation methodologies. Generator unit emissions are calculated using one of two methods based on whether the generator unit is classified as a Tier 2 unit or a Tier 4 unit. PSE is required to estimate emissions from Tier 2 generator units based on annual fuel consumption (from company records) together with measured fuel-specific high heat values and default CO2 emission factors. Tier 4 generator units have Continuous Emission Monitoring Systems (CEMS) that gather data on emissions. The Tier 4 method is only appropriate for combustion units that have certain types of existing CEMS in place and that meet several other specific criteria, such as fuel type and hours of operation.
Where is it otherwise reported by the Company and how frequently	This metric is currently reported to the Environmental Protection Agency annually and to the UTC in Annual Energy and Emissions Intensity reports. In the future this metric will also be reported annually as part of the reports required by WAC 480-100-650 (3).
Readily-available data (if any) for the last five historical years	Yes
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.

Comments	

5. Advanced Metering Infrastructure (AMI)

Metric	**AMI Bill Read Success Rate - Electric**
Definition of the metric	The AMI system's success rate at delivering a meter read to PSE's data system for electric customers
A brief commentary on how the metric is calculated	Success rate (%) is calculated as the number of meter reads received within a cycle divided by the total number of meters in that cycle * 100. All cycles for a calendar month are then aggregated to one performance measure for that month. The monthly performances would be aggregated for each calendar year. The calculation excludes off-cycle or daily-meter services, skip meters, and meters or modules that have been removed or not replaced, power outages to AMI meters, and endpoints that are not in normal status.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	Data are available for 2019-present.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	The proposed target is the standard established in PSE's contract with its meter read delivery vendor. Targets would not begin until 2024.
Comments	PSE began measuring in 2019 for monitoring. Before 2024, lower bill read success rates may reflect implementation issues in AMI deployment rather than the expected performance of AMI.

Metric	**AMI Bill Read Success Rate - Gas**
Definition of the metric	The AMI system's success rate at delivering a meter read to PSE's data system for gas customers
A brief commentary on how the metric is calculated	Success rate (%) is calculated as the number of meter reads received within a cycle divided by the total number of meters in that cycle * 100. All cycles for a month are then aggregated to one performance measure each month. The monthly performances would be aggregated for each calendar year.

	The calculation excludes off-cycle or daily-meter services, skip meters, and meters or modules that have been removed or not replaced, power outages to AMI meters, and endpoints that are not in normal status.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	Data are available for 2019-present.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	The proposed target is the standard established in PSE's contract with its meter read delivery vendor. Targets would not begin until 2024.
Comments	PSE began measuring in 2019 for monitoring. Before 2024, lower bill read success rates may reflect implementation issues in AMI deployment rather than the expected performance of AMI.

Metric	**Remote Switch Success Rate**
Definition of the metric	The total electric AMI switch and system success rate when a command is made from the "command center" by PSE.
A brief commentary on how the metric is calculated	Success rate is calculated as the number of confirmations sent within 120 seconds to disconnect or reconnect followed by the number of confirmed receipts that disconnection or reconnection occurred divided by total sent * 100. Calculation only includes customer-initiated requests and is limited by the internal protection mechanism of maximum of 1000 commands sent at any one time. Calculation excludes commands sent to a meter that is experiencing a power outage.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	Data are available for 2020-present only.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	The proposed target is based on the contractual standard PSE has agreed to with the vendor managing the command center that issues and receives switch function commands. Targets would not begin until 2024.
Comments	

Metric	Reduced Energy Consumption from Voltage Reductions (kWh)
Definition of the metric	First year reduction in energy consumption, measured in kWh, which results from lowering the voltage on a circuit at the substation.
A brief commentary on how the metric is calculated	The first year energy savings in kWh for each substation are determined after each voltage reduction project is implemented using a protocol from the Regional Technical Forum/Northwest Energy Efficiency Alliance. This protocol is generally based on the annual energy consumed for a circuit as measured at the substation multiplied by the conservation voltage reduction factor defined in the protocol multiplied by the percent change in voltage at a substation before voltage reduction and after voltage reduction. All substation circuits in which voltage reduction is deployed in a given year will be aggregated together for a total energy savings measure.
Where is it otherwise reported by the Company and how frequently	This metric is reported in PSE's Annual Report of Energy Conservation Accomplishments.
Readily-available data (if any) for the last five historical years	Data are available for at least the last 5 years.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	Targets are set in Biennial Conservation Plan proceedings.
Comments	

6. Additional Equity Metrics

Metric	Number of low-income customers receiving bill assistance (gas and electric)
Definition of the metric	Number of customers who received income-qualified bill assistance during the calendar year
A brief commentary on how the metric is calculated	Count of distinct customers who received bill assistance from one or more income-qualified programs during the calendar year. Customers with multiple forms of assistance during the same calendar year will only be counted once based on their PSE account number.

	The calculation of this metric includes participants in the Low-Income Home Energy Assistance Program (LIHEAP), PSE Home Energy Lifeline Program (PSE HELP), and Salvation Army (warm home fund) programs. Once approved and implemented, the metric will be updated to incorporate participants in the Arrearage Management Program and the Bill Discount Rate.
Where is it otherwise reported by the Company and how frequently	Data similar to this metric are reported, but not in the same way as this proposed metric.
Readily-available data (if any) for the last five historical years	Historical data for this metric are not readily available.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	Program details for programs included in the metric: i. LIHEAP: federal income qualified grants for households up to 150% federal poverty level (FPL) to help pay for winter heating bills ii. PSE HELP: provides bill payment assistance beyond LIHEAP for households up to the greater of 80% Area Median Income or 200% FPL iii. Salvation Army iv. Arrearage Management Program (AMP): a program being proposed in the upcoming general rate case (GRC) to provide arrearage relief to households up to the greater of 80% Area Median Income or 200% FPL. v. Bill Discount Rate: a program being proposed in the upcoming GRC to assist with affordability by providing a bill discount to households up to 50% Area Median Income. Programs not being included are in the metric: i. CACAP 1-3 – these are one-time programs created as a result of COVID-19 and would skew any historical trends or baseline. ii. Non-CAP agency assistance – these programs may not all be income based. PSE tends to not include them in a lot of reporting, though it could be included. iii. Area Median Income Opt-out PSE HELP – there are very few accounts in this bucket (total of 21) iv. Low-income weatherization

Metric	**Share of bill assistance customers who are in highly impacted communities and vulnerable populations**
Definition of the metric	The percentage of bill assistance customers who are in highly impacted communities and/or vulnerable populations
A brief commentary on how the metric is calculated	For each distinct customer at the contract account level who received at least one form of bill assistance, PSE will determine whether they lived in a highly impacted community and/or a vulnerable population at the time they received assistance. Customers with multiple forms of assistance during the same calendar year will only be counted once. The calculation of this metric includes participants in the LIHEAP and PSE HELP and Salvation Army (warm home fund) programs. Once approved and implemented, the metric will be updated to incorporate participants in the Arrearage Management Program and the Bill Discount Rate.
Where is it otherwise reported by the Company and how frequently	This metric is not currently reported.
Readily-available data (if any) for the last five historical years	Historical data are not readily available.
Basis for any targets that have been established for 2021 and the years of the rate plan (2022-25).	No target is proposed for this metric.
Comments	Program details for programs included in the metric: vi. LIHEAP: federal income qualified grants for households up to 150% FPL to help pay for winter heating bills vii. PSE HELP: provides bill payment assistance beyond LIHEAP for households up to the greater of 80% Area Median Income or 200% FPL viii. Salvation Army ix. Arrearage Management Program (AMP): a program being proposed in the upcoming general rate case (GRC) to provide arrearage relief to households up to the greater of 80% Area Median Income or 200% FPL. x. Bill Discount Rate: a program being proposed in the upcoming GRC to assist with affordability by providing a bill discount to households up to 50% Area Median Income. Programs not being included are in the metric: v. CACAP 1-3 – these are one-time programs created as a result of COVID-19 and would skew any historical trends or baseline.

	vi. Non-CAP agency assistance – these programs may not all be income based. PSE tends to not include them in a lot of reporting, though it could be included. vii. AMI Opt-out PSE HELP – there are very few accounts in this bucket (total of 21) viii. Low-income weatherization HIC and VP data are currently available for the electric service territory ONLY. PSE will gather data for the gas only service territory, but it will take some time to incorporate (Q1 or Q2).