

**EXH. DJL-8  
DOCKETS UE-240004/UG-240005  
2024 PSE GENERAL RATE CASE  
WITNESS: DAVID J. LANDERS**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-240004  
Docket UG-240005**

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

**DAVID J. LANDERS**

**ON BEHALF OF PUGET SOUND ENERGY**

**FEBRUARY 15, 2024**

**PUGET SOUND ENERGY**

**SEVENTH EXHIBIT (NONCONFIDENTIAL) TO THE  
PREFILED DIRECT TESTIMONY OF  
DAVID J. LANDERS**

**CONTENTS**

I. STORM DEFERRAL OVERVIEW.....1

II. 2021 WEATHER EVENTS.....2

    A. December 11, 2021 .....2

    B. December 25, 2021 .....2

III. 2022 WEATHER EVENTS.....3

    A. January 3, 2022 .....3

    B. April 4, 2022 .....3

    C. November 4, 2022.....4

    D. November 29, 2022.....4

    E. December 3, 2022 .....4

    F. December 23, 2022 .....5

IV. CONCLUSION.....5

1 **PUGET SOUND ENERGY**

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3 **PREFILED DIRECT TESTIMONY OF**  
4 **DAVID J. LANDERS**

5 **I. STORM DEFERRAL OVERVIEW**

6 Emergency outage response activations occur each year. Puget Sound Energy  
7 (“PSE”) prepares to respond to these events through annual trainings as well as an  
8 electric outage exercise. More than 800 employees have unique emergency roles to assist  
9 in this effort, so outages are managed and restored in an efficient manner. Outages are  
10 caused by windstorms, heavy snow and ice, and can also be caused by wide area  
11 flooding, wildfires, or earthquakes.

12 In PSE’s service territory, storm events are not a theoretical concern. PSE’s  
13 service territory is located in the Puget Sound Convergence Zone and is subject to  
14 frequent severe weather. Major storm events can cause significant service disruption and  
15 require PSE to focus substantial resources on timely storm repair. Timely storm response,  
16 repair, and resolution of outages are very important to customers and PSE. Restoration  
17 efforts result in significant costs that PSE should be allowed to recover so it can continue  
18 to provide safe and reliable service to its customers. The events are beyond PSE’s control  
19 and create variability and volatility in rates for customers if not deferred.

20 PSE is allowed to defer storm costs associated with days that exceed the IEEE  
21 Standard 1366 (“IEEE1366”) definition of a major event day threshold value,  $T_{MED}$ ,  
22 which is based on values of daily SAIDI for the previous five years. The major event day  
23 threshold is defined as 2.5 standard deviations from the average daily SAIDI.



1 outages through snow and ice conditions. The event SAIDI was 14.97 with a daily SAIDI  
2 on December 25 of 7.21, exceeding PSE's 2021 T<sub>MED</sub> of 6.38 minutes for a qualifying  
3 event.

### 4 III. 2022 WEATHER EVENTS

5 PSE and its customers experienced six IEEE1366 qualifying storm events during  
6 2022.

#### 7 **A. January 3, 2022**

8 A winter storm on January 3, 2022, brought heavy rains and wind to lowlands  
9 with significant mountain snowfall and as a result, 29,255 customers were without power.  
10 Crews responded to 213 outages, primarily in the Kitsap region's distribution lines. There  
11 were no transmission impacts and one substation was impacted. The event SAIDI was  
12 11.02 with a daily SAIDI on January 3 of 8.29, exceeding PSE's 2022 T<sub>MED</sub> of 7.80  
13 minutes for a qualifying event.

#### 14 **B. April 4, 2022**

15 On April 4, 2022, a strong system brought high winds up to 55 miles per hour  
16 along with periods of thunderstorms and rising river conditions to western Washington  
17 that left 52,527 customers without power. Forty-eight crews responded to 487 outages  
18 including 16 transmission segment outages and two substation circuit outages. The event  
19 SAIDI was 25.77 with a daily SAIDI on April 4 of 28.17, exceeding PSE's 2022 T<sub>MED</sub> of  
20 7.80 minutes for a qualifying event.

1 **C. November 4, 2022**

2 On November 4, 2022, thrashing winds across the Puget Sound region left  
3 branches and trees scattered along roadways and leaving 227,590 PSE customers without  
4 power. Seventy-three PSE crews responded to 1,033 outages with 19 transmission line  
5 segments and ten substations sustaining damage. The event SAIDI was 119.38 with a  
6 daily SAIDI on November 4 of 105.34, exceeding PSE's 2022 T<sub>MED</sub> of 7.80 minutes for a  
7 qualifying event.

8 **D. November 29, 2022**

9 On November 29, 2022, a winter storm impacted areas of the Pacific Northwest  
10 from Oregon to Washington bringing wind gusts as high as 78 miles per hour in the  
11 Cascade Mountains along with heavy, wet snow in several areas impacting 136,529  
12 customers over the course of the event. Thirty-eight crews worked to restore 607 outages,  
13 11 transmission segments and three substations. The event SAIDI was 30.94 with a daily  
14 SAIDI on November 29 of 21.12, exceeding PSE's 2022 T<sub>MED</sub> of 7.80 minutes for a  
15 qualifying event.

16 **E. December 3, 2022**

17 In December 2022, several days of rain, snow, and high winds resulted in 36,404  
18 customers being impacted in this short-duration event. Twenty PSE crews worked to  
19 restore 187 outages mainly in the town of Skykomish as well as the Kitsap service area.  
20 One transmission line was also impacted. The event SAIDI was 8.91 with a daily SAIDI  
21 on December 3 of 9.63, exceeding PSE's 2022 T<sub>MED</sub> of 7.80 minutes for a qualifying  
22 event.

1 **F. December 23, 2022**

2 On December 23, 2022, lingering snow, followed by freezing rain, resulted in icy  
3 roadways, broken branches, and some broken power poles due to ice-covered power lines  
4 with some locations experiencing 0.10 inches of ice accumulation. During the storm, PSE  
5 crews restored power to over 202,765 customers associated with 906 outages. Seven  
6 transmission lines and three substations were impacted. Sixty PSE crews worked to  
7 restore power. The event SAIDI was 57.95 with the daily SAIDI on December 23 of  
8 16.01, exceeding PSE's 2022 T<sub>MED</sub> of 7.80 minutes.

9 **IV. CONCLUSION**

10 **Q. Does this conclude your testimony?**

11 **A. Yes, it does.**