

**EXHIBIT NO. \_\_ (EDH-13)  
DOCKET UE-200115  
COLSTRIP UNIT 4 SALE  
WITNESS: EZRA D. HAUSMAN, PH.D.**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Application of**

**PUGET SOUND ENERGY,**

**For an Order Authorizing the Sale of  
All of Puget Sound Energy's Interests  
in Colstrip Unit 4 and Certain of Puget  
Sound Energy's Interests in the  
Colstrip Transmission System**

**Docket UE-200115**

**EXHIBIT EDH-13 TO THE  
PREFILED DIRECT TESTIMONY OF  
EZRA D. HAUSMAN, PH.D.  
ON BEHALF OF THE SIERRA CLUB**

**October 2, 2020**

**Washington Utilities and Transportation Commission v. Puget Sound Energy**  
**DOCKET UE-200115**  
**Sierra Club's Fourth Set of Data Requests to Puget Sound Energy**  
**September 10, 2020**

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21. In response to Sierra Club Data Request No. 006, PSE states (in part) that “the structure of the proposed power purchase agreement with NorthWestern Energy provides a hedge because PSE pays the greater of the floor price (dispatch cost) and the difference between the market price and the O&M base equivalent.”
  - a. Please explain how it is a hedge for the Company to be responsible for either effectively the Mid-C price (Mid-C price – Base O&M + allocated O&M) or the floor price, *whichever is higher*? Please explain against what risk this hedge protects PSE. Please provide a numerical example.
  
22. With respect to the direct testimony of Thomas M. Flynn, Table 3 on page 12, please explain why the calculation shown does not include a line representing “Capacity for Transmission of NorthWestern Energy Output” as seen in Table 2 on Page 11.
  
23. Please provide the 2020 Colstrip budget and an explanation for why PSE voted “No” on the 2020 Colstrip Operations & Maintenance (O&M) budget.
  - a. Did PSE put forward an alternative 2020 O&M budget? If so, please provide the alternative budget proposal.
  
  - b. Please provide all versions of the 2020 Colstrip O&M budget provided by Talen to the Ownership and Operations committee.
  
  - c. Please provide all communications between PSE and Portland Gas & Electric related to the Colstrip 2020 O&M budget.