

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-151871 UG-151872  
Puget Sound Energy's  
Electric and Natural Gas Equipment Lease Service**

**WUTC STAFF DATA REQUEST NO. 086**

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Please provide the citation for Mr. McCulloch's assertion on page 15, lines 14-19, of Exhibit No. MBM-7T that Mr. Cebulko claims the exclusion of non-standard costs from the tariff result in customers paying for a service that bears no reasonable relationship to the rates they are required to pay? Does PSE concede that the only time Mr. Cebulko uses the phrase "bears no reasonable relationship" is in a discussion on customer cross-subsidization within an appliance category?

**Response:**

Mr. Cebulko uses the phrase "bears no reasonable relationship" in a discussion on pages 24 through 26 of his testimony, where Staff details its concern that "participating customers will not receive service commensurate with the costs," which also includes comments related to customer cross-subsidization. This followed a previous discussion starting on page 23, in which non-standard costs were referenced in association to the proposed services. As this section broadly references Puget Sound Energy rate design, of which standard and non-standard cost inputs are referenced, Mr. McCulloch's statement is appropriate.