

EXHIBIT NO. ___(JAD-7)
DOCKET NO. UE-060266/UG-060267
2006 PSE GENERAL RATE CASE
WITNESS: JEFFREY A. DUBIN

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-060266
Docket No. UG-060267

**SECOND EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED REBUTTAL TESTIMONY OF
JEFFREY A. DUBIN
ON BEHALF OF PUGET SOUND ENERGY, INC.**

AUGUST 23, 2006

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-060266 & UG-060267
Puget Sound Energy, Inc.'s
2006 General Rate Case**

WUTC STAFF DATA REQUEST NO. 016

WUTC STAFF DATA REQUEST NO. 016:

Re: Regarding Exhibit No. ____ (JAD-1T), at pages 23-26

Please explain, and provide supporting documentation, to show why statistical analysis alone can be used to establish base or balance point temperature. Please explain, and provide supporting documentation, if non-statistical analysis was used to justify the use of different base or balance point temperature.

Response:

Base and balance point temperatures are numbers from which heating and cooling degrees calculations are made. Statistical analysis is not required to establish a base temperature. NOAA defines a heating degree measure around a base temperature. If it picks 65 degrees, one calculation follows and if it picks 60 degrees another calculation follows and so forth. See also PSE's Response to WUTC Staff Data Request No. 014.

Different base or balance point temperatures, in addition to 65 degrees F, were used to capture the non-linearity in the load-weather relationship. As described in the Prefiled Direct Testimony of Dr. Jeffrey Dubin, this non-linearity has been noted by many researchers for years, and is clearly evident for the PSE system loads as shown in Figures 5-6 in page 24 of the Prefiled Direct Testimony of Dr. Jeffrey Dubin.