

**Exhibit No. JT-4  
Dockets UE-090704 and UG-090705  
Witnesses: Alan P. Buckley  
Donald W. Schoenbeck**

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY, INC.,**

**Respondent.**

**DOCKET UE-090704**

**DOCKET UG-090705**

**EXHIBIT TO TESTIMONY OF**

**ALAN P. BUCKLEY  
AND  
DONALD W. SCHOENBECK**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

***Company Response to ICNU Data Request No. 02.15***

**November 17, 2009**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-090704 and UG-090705  
Puget Sound Energy, Inc.'s  
2009 General Rate Case**

**ICNU DATA REQUEST NO. 02.15**

**ICNU DATA REQUEST NO. 02.15:**

With regard to the Revised Workpapers of David E. Mills, page DEM0094, please provide an explanation for the change in 50 year average hydro generation for each Westside facility for all columns on this page from the 2007 GRC value.

**Response:**

David E. Mills' power cost workpaper Revised DEM0094 contains the monthly 50-year average generation with and without maintenance outages for Puget Sound Energy, Inc.'s ("PSE") owned hydro facilities, Snoqualmie, Electron, and Lower and Upper Baker. For information regarding scheduled maintenance on the aforementioned facilities during the rate year, please refer to the Revised Workpapers of David E. Mills, page "Revised WP, DEM 0024" or "DEM-WP(C) Resource Summary 2009GRC Update.xls".

Attached as Attachment A to PSE's Response to ICNU Data Request No. 02.15, is an MS Excel spreadsheet containing a comparison of the 50-year average hydro generation before maintenance for each PSE-owned hydro facility assumed in the rate year power cost forecast provided in PSE's supplemental evidence, filed on September 28, 2009, and that assumed in the 2007 general rate case, Docket UE-072300. The remainder of this response is an explanation of differences shown in this attachment.

Lower and Upper Baker 50-year average generation included in PSE's supplemental power cost forecast is lower than the 2007 GRC by 13,401 MWhs and 18,567 MWhs respectively. The 50-year average for Lower and Upper Baker is updated for every rate case using the Baker model, which incorporates 50-year average historical inflows with current operational conditions such as starting and ending elevation levels. During the preparation of the response to this data request, however, PSE discovered that PSE inadvertently used an incorrect generation forecast period when it updated Lower and Upper Baker generation in the AURORA model to reflect the new Baker model run. This error resulted in lower rate year hydro generation for Lower Baker and Upper Baker by 16,887 MWhs and 17,774 MWhs respectively. Including this correction in

PSE's supplemental power cost forecast would reduce rate year power costs by approximately \$1.8 million.

For the period March 2010 through June 2010, the Snoqualmie hydro facility will be operating at a reduced capacity due to the planned outage of Powerhouse #1. During that time period, the capacity of Snoqualmie will be reduced from 42.9 MW to 31 MWs. To reflect the impact of this partial outage, PSE reduced the maximum output for these months to 31 MWs. The decrease in the 50-year average generation from the 2007 GRC is 20,711 MWhs. Once the full Snoqualmie outage begins in July 2010, the maintenance is treated as a normal outage, where the 50-year average is left unadjusted and the AURORA model is updated to reflect that the facility is off-line.

Attachment A to PSE's Response to ICNU Data Request No. 02.15 is CONFIDENTIAL per protective Order in WUTC Docket Nos. UE-090704 and UG-090705.