

**EXHIBIT NO. ___(CES-19)
DOCKET NO. UE-060266/UG-060267
2006 PSE GENERAL RATE CASE
WITNESS: CALVIN E. SHIRLEY**

**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**

**TENTH EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED REBUTTAL TESTIMONY OF
CALVIN E. SHIRLEY
ON BEHALF OF PUGET SOUND ENERGY, INC.**

AUGUST 23, 2006

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

Docket Nos. UE-060266/UG-060267

WUTC v. PSE

**RESPONSE OF PUBLIC COUNSEL TO PSE
DATA REQUESTS 1 through 18**

Request No: 10
Directed to: Simon ffitc
Date Received: July 28, 2006
Date Produced: August 8, 2006
Prepared by: Elizabeth Klumpp
Witnesses: Elizabeth Klumpp

DATA REQUEST NO. 10.

(Ref: E. C. Klumpp Exhibit 2)

Referring to Ms. Klumpp's proposed Requirement #6 in Exhibit No. ___(ECK-3), which states that energy savings from the market transformation initiatives operated by the Northwest Energy Efficiency Alliance (NEEA) may only be counted toward the incentive target for initiatives that received funding during the program year,

- a) has Ms. Klumpp's proposed 20 aMW target, referred to on page 8 of her testimony, been adjusted for this requirement?
- b) Please provide an explanation, calculations and all documentation supporting Ms. Klumpp's proposed 20 aMW target amount.

RESPONSE:

To clarify this point, Public Counsel will amend Exhibit No. ___(ECK-3) so that Design Criteria Requirement No. 6 will include an exception for counting electricity savings for 2007. The new language included in Requirement No. 6 will read as follows.

“Note: In 2007 there is an exception to the methodology for counting savings from NEEA. The company will claim NEEA-related savings using the methodology consistent with how it projected NEEA savings for 2006 and 2007. However, the claimed NEEA-related savings will not exceed 14,500 MWhs in 2007. This is the annual savings value the company filed in its *Program Targets and Budgets* for 2006 and 2007 for the company’s investment in NEEA (Exhibit No. ___ECK-5).”

Consequently, for 2007, Public Counsel's proposed 20 aMW target includes all of the same programs and targets as the company outlined in its Nov/Dec 2005 filing, *Program Targets and Budgets* for 2006 and 2007 (Exhibit No. __ECK-5).