

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. 033****WUTC STAFF DATA REQUEST NO. 033:**

If PSE has performed the analysis, please provide the total resource cost test in accordance with the Northwest Power and Conservation Council methodology, and the workpapers, for each appliance offered through the proposed lease program.

Response:

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 033 to the extent that WUTC Staff Data Request No. 033 requests PSE to perform a hypothetical calculation. The Request is unclear as to what calculation should be made and what assumptions would be necessary to perform such a calculation. Furthermore, it calls for information that is neither relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence since the Equipment Leasing Service is not filed as a Conservation program subject to Northwest Power and Conservation Council methodology. Without waiving the objections and subject thereto, PSE provides the following response.

PSE has not completed a total resource cost test within the methodology used for a Conservation measure. The 2016-2017 Biennial Conservation Plan does not contain analyses on the proposed Equipment Leasing Service.