

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

In the Matter of the Application of

PUGET SOUND ENERGY

For an Order Authorizing the Sale of All of Puget Sound Energy's Interests in Colstrip
Unit 4 and Certain of Puget Sound Energy's Interests in Colstrip Transmission System

DOCKET UE-200115

**PAUL L. CHERNICK
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT PLC-14

Puget Sound Energy Response to Public Counsel Data Request No 56

October 2, 2020

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-200115
Puget Sound Energy
Application Authorizing Sale of PSE Interest in Colstrip Unit 4**

PUBLIC COUNSEL DATA REQUEST NO. 056

“CONFIDENTIAL” Table of Contents

DR NO.	“CONFIDENTIAL” Material
056	Shaded information in Attachment A to Puget Sound Energy’s Response to Public Counsel Data Request No. 056 is designated as CONFIDENTIAL per Protective Order in Docket UE-200115.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-200115
Puget Sound Energy
Application Authorizing Sale of PSE Interest in Colstrip Unit 4**

PUBLIC COUNSEL DATA REQUEST NO. 056:

Please refer to Cindy L. Song, Exh. CLS-9C, in the electronic spreadsheet ‘UE-200115-PSE-Exh-CLS-09C-2020-08-20 (C).xlsx’.

- a. Please explain why the value for the replacement capacity charge in cell H22 of the ‘Hedging (C)’ tab differs from the value in cell H22 of the ‘No Hedging (C)’ tab.
 - i. If this is an error, please provide a corrected version of the referenced electronic spreadsheet.
- b. Please provide a modified version of the referenced electronic spreadsheet (as corrected per subpart (a) of this data request) which extends the calculations shown in the ‘Cost Breakdown (C)’ tab through December 31, 2025.
- c. With regard to the NPV results shown in the ‘NPV savings comparison (C)’ tab, did PSE evaluate the sensitivity of those results to a delay in the assumed commencement date beyond December 31, 2020? If so, please provide copies all such sensitivity analyses

Response:

- a. Puget Sound Energy (“PSE”) inadvertently did not include the escalation rate in cell H22 of the tab “Hedging” in the First Exhibit to the Prefiled Supplemental Testimony of Cindy L. Song, Exh. CLS-9C.

Attached as Attachment A to PSE’s Response to Public Counsel Data Request No. 056 is a corrected version of the worksheet. The change had no appreciable impact to the final results.

- b. Please see Attachment A to PSE Response Public Counsel Data Request No. 056 for the updated “Cost Breakdown” tab. PSE modified the “Cost Breakdown” tab to include the replacement costs of the proposed power purchase agreements with NorthWestern Energy and Talen Montana, LLC after the projected expiration of those agreements on December 2, 2025.

The replacement costs in cell H29 and H34 in the “No Hedging” and “Hedging” tabs are now included in cell I7 and I33 the “Cost Breakdown” tab for their respective scenarios. This change impacts the total in cells I8 and I34 and \$/MWh in 2025.

- c. The purchase and sales agreements have a condition precedent that the transactions close on or before December 31, 2020. Therefore, PSE did not conduct an analysis under a scenario in which they were delayed.

Shaded information in Attachment A to Puget Sound Energy’s Response to Public Counsel Data Request No. 056 is designated as CONFIDENTIAL per Protective Order in Docket UE-200115.