



September 25, 2019

Filed Via Web Portal

Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: Docket UE-170002 and UG-170003: Comments of Puget Sound Energy Small Business Economic Impact Statement

Dear Mr. Johnson:

Puget Sound Energy ("PSE" or "the Company") submits these comments in response to the Notice of Opportunity to respond to the Small Business Economic Impact Statement (SBEIS) Questionnaire with analysis of whether the draft rules impose a cost impact on the Company.

PSE expects that the draft proposed rules will have an additional cost impact to PSE. The proposed rules will require the Company to expend additional time and resources to prepare documents for filing with the Commission and for submission to parties during the discovery process. Currently, testimony is provided with cites to exhibits along with providing live links between those exhibits and work papers. Under the proposed rules, all testimony and exhibits must cite to work papers. Under the proposed rules, each spreadsheet must also include an index identifying its relationship with other spreadsheets. In addition, the rules propose consolidating all associated calculations necessary to support the results of the study in the same electronic workbook file. In regard to modeling structure, the proposed rules significantly expand the scale of the Company's existing cost of service modeling by requiring the disaggregation of rate classes, which have been accepted by the Commission for decades, to individual rate schedules that may have little to no distinguishing service characteristics. Finally, as it relates to underlying data, it appears that these draft rules would require PSE to incorporate potentially billions of additional usage data points in the development of its analysis.

These additional requirements will add significant complexity to the preparation of documents for filing with the Commission and in discovery. The Company expects that additional legal, paralegal, and administrative and IT resources will need to be devoted to consolidate dozens of workbooks, determine the appropriate relationships and references on each page of testimony, exhibit and work papers submitted, significantly expand its existing modeling and manage the potentially billions of additional usage data points required in rule. While it is difficult to quantify the additional costs associated with the proposed rules, the Company anticipates additional internal resources, and potentially, outside legal and consulting resources dedicated to ensuring compliance with the new proposed rules. As written, the Company believes that the new proposed rules could double or triple the amount of time required to prepare and mark documents.

PSE is not aware of any cost savings created by the proposed rules.

Thank you for the opportunity to provide comments. Please contact Birud Jhaveri at (425) 462-3946 or birud.jhaveri@pse.com for additional information or questions regarding this filing. If you have any other questions, please contact me at (425) 456-2142.

Sincerely,

/s/ Jon Piliaris

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