Exhibit No.___ (DWS-5)
Docket Nos. UE-111048/UG-111049
Witness: Donald W. Schoenbeck

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant, v. PUGET SOUND ENERGY, INC., Respondent.	)	Docket Nos. UE-111048/UG-111049 *(Consolidated)*

EXHIBIT NO. ___ (DWS-5)

PSE RESPONSES TO PUBLIC COUNSEL DR 026 AND ICNU DRS 5.6-5.10

December 7, 2011

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case

PUBLIC COUNSEL DATA REQUEST NO. 026

PUBLIC COUNSEL DATA REQUEST NO. 026:

Please provide annual non-fuel O&M expenses for each of PSE's generating facilities by FERC account for each of the last four calendar years.

Response:

Attached as Attachment A to Puget Sound Energy, Inc.'s ("PSE") Response to Public Counsel Data Request No 026, please find a list of non-fuel operations and maintenance expenses for PSE's generating facilities by FERC account for the years 2007, 2008, 2009 and 2010.

Attachment A
PSE Resp PC DR26

PSE Generation Operation and Maintenance Expense by FERC Account

Plant	Plant Descr	FERC Account	FERC Description	2007	2008	2009	2010
1000	Puget Sound Energy	535	Hydraulic Operation Supv & Engineering	0	6,504	2,734	67
1000	Puget Sound Energy	537	Hydraulic Expenses	0	0	6,984	0
1000	Puget Sound Energy	539	Misc Hyd Power Generation Expense	62,831	12,844	2,466	0
1000	Puget Sound Energy	546	Other Power Supervision & Engineering	1,794	63,926	108,119	149,117
1000	Puget Sound Energy	548	Generation Expense	4,267	0	0	0
1000	Puget Sound Energy	549	Misc Other Power Generation Expense	138,473	315,286	84,721	0
1000	Puget Sound Energy	553	Maintenance of Generating and Electric Plant	11,930	844	0	0
1000	Puget Sound Energy	554	Maint of Misc Generating Plant	0	3,279	4,430	4,657
	Puget Sound Energy Total			**219,295**	**402,683**	**209,453**	**153,840**
3030	Lower Baker Hydro Plant	535	Hydraulic Operation Supv & Engineering	110,159	166,285	435,682	1,421,997
3030	Lower Baker Hydro Plant	537	Hydraulic Expenses	231,661	334,352	995,721	1,460,162
3030	Lower Baker Hydro Plant	538	Electric Expense	239,655	324,728	351,789	0
3030	Lower Baker Hydro Plant	539	Misc Hyd Power Generation Expense	710,209	809,858	1,307,092	925,906
3030	Lower Baker Hydro Plant	541	Hyd Maint Supervision & Engineering	70,211	44,085	57,440	0
3030	Lower Baker Hydro Plant	542	Maintenance of Structures	332,266	252,471	151,902	233,679
3030	Lower Baker Hydro Plant	543	Maint of Reservoirs, Dams, and Waterways	110,046	73,672	77,924	79,124
3030	Lower Baker Hydro Plant	544	Maint of Electric Plant	92,845	364,552	291,638	187,385
3030	Lower Baker Hydro Plant	545	Maintenance of Hydraulic Production Plant	242,469	489,725	1,622,407	1,345,542
	Lower Baker Hydro Plant Total			**2,139,521**	**2,859,726**	**5,291,595**	**5,653,795**
3031	Upper Baker Hydro Plant	535	Hydraulic Operation Supv & Engineering	133,621	189,729	340,756	892,442
3031	Upper Baker Hydro Plant	537	Hydraulic Expenses	835,453	1,000,046	1,940,423	2,016,380
3031	Upper Baker Hydro Plant	538	Electric Expense	311,513	258,263	240,543	0
3031	Upper Baker Hydro Plant	539	Misc Hyd Power Generation Expense	274,983	595,858	1,490,374	1,714,868
3031	Upper Baker Hydro Plant	541	Hyd Maint Supervision & Engineering	177,289	78,136	39,960	52
3031	Upper Baker Hydro Plant	542	Maintenance of Structures	159,658	155,526	90,599	96,640
3031	Upper Baker Hydro Plant	543	Maint of Reservoirs, Dams, and Waterways	246,958	109,723	101,249	45,829
3031	Upper Baker Hydro Plant	544	Maint of Electric Plant	143,490	316,034	343,883	254,730
3031	Upper Baker Hydro Plant	545	Maintenance of Hydraulic Production Plant	940,937	822,552	1,224,560	2,319,518
	Upper Baker Hydro Plant Total			**3,223,901**	**3,525,868**	**5,812,347**	**7,340,460**
3032	Electron Hydro Plant	535	Hydraulic Operation Supv & Engineering	212,589	178,578	222,202	879,087
3032	Electron Hydro Plant	537	Hydraulic Expenses	628,585	614,909	713,041	536,515
3032	Electron Hydro Plant	538	Electric Expense	342,226	373,834	355,400	283,670
3032	Electron Hydro Plant	539	Misc Hyd Power Generation Expense	431,950	553,925	612,803	831,477
3032	Electron Hydro Plant	541	Hyd Maint Supervision & Engineering	155,523	76,198	135,099	2,387
3032	Electron Hydro Plant	542	Maintenance of Structures	752,163	149,651	144,644	130,824
3032	Electron Hydro Plant	543	Maint of Reservoirs, Dams, and Waterways	310,149	326,250	973,485	440,638
3032	Electron Hydro Plant	544	Maint of Electric Plant	259,480	318,099	258,100	154,217
3032	Electron Hydro Plant	545	Maintenance of Hydraulic Production Plant	372,153	525,900	982,932	476,263
	Electron Hydro Plant Total			**3,464,798**	**3,117,344**	**4,397,706**	**3,735,078**
3034	Snoqualmie Hydro Plant 1	535	Hydraulic Operation Supv & Engineering	104,322	99,692	58,278	121,896
3034	Snoqualmie Hydro Plant 1	537	Hydraulic Expenses	285,909	634,051	580,126	607,913
3034	Snoqualmie Hydro Plant 1	538	Electric Expense	277,197	295,196	232,679	59,728
3034	Snoqualmie Hydro Plant 1	539	Misc Hyd Power Generation Expense	436,041	362,352	293,100	368,342
3034	Snoqualmie Hydro Plant 1	540	Rents	22,081	0	35	0
3034	Snoqualmie Hydro Plant 1	541	Hyd Maint Supervision & Engineering	54,906	17,702	57,083	0
3034	Snoqualmie Hydro Plant 1	542	Maintenance of Structures	96,855	68,776	82,569	64,614
3034	Snoqualmie Hydro Plant 1	543	Maint of Reservoirs, Dams, and Waterways	63,617	25,575	67,477	21,244
3034	Snoqualmie Hydro Plant 1	544	Maint of Electric Plant	498,166	473,233	691,455	81,558
3034	Snoqualmie Hydro Plant 1	545	Maintenance of Hydraulic Production Plant	606,508	614,623	697,036	494,178
3034	Snoqualmie Hydro Plant 1	550	Rents	(0)	0	0	0
	Snoqualmie Hydro Plant 1 Total			**2,445,602**	**2,591,199**	**2,759,838**	**1,819,474**
3035	Snoqualmie Hydro Plant 2	535	Hydraulic Operation Supv & Engineering	132,345	123,411	93,867	151,831
3035	Snoqualmie Hydro Plant 2	537	Hydraulic Expenses	5,400	8,018	8,272	11,435
3035	Snoqualmie Hydro Plant 2	538	Electric Expense	247,150	265,099	241,669	103,282
3035	Snoqualmie Hydro Plant 2	539	Misc Hyd Power Generation Expense	35,018	167,439	148,287	83,556
3035	Snoqualmie Hydro Plant 2	540	Rents	40,944	19,914	0	0
3035	Snoqualmie Hydro Plant 2	541	Hyd Maint Supervision & Engineering	24,045	7,416	60,977	0

3035	Snoqualmie Hydro Plant 2	542	Maintenance of Structures	24,124	34,447	41,107	2,129
3035	Snoqualmie Hydro Plant 2	543	Maint of Reservoirs, Dams, and Waterways	47,459	21,003	9,349	44,868
3035	Snoqualmie Hydro Plant 2	544	Maint of Electric Plant	511,637	423,184	378,586	68,895
3035	Snoqualmie Hydro Plant 2	545	Maintenance of Hydraulic Production Plant	22,586	38,507	37,854	144,116
3035	Snoqualmie Hydro Plant 2	550	Rents	0	0	0	0
	Snoqualmie Hydro Plant 2 Total			**1,090,708**	**1,108,438**	**1,019,969**	**610,111**
3049	Hopkins Ridge Wind Plant	546	Other Power Supervision & Engineering	206,594	368,132	653,590	512,054
3049	Hopkins Ridge Wind Plant	549	Misc Other Power Generation Expense	261,941	486,501	366,912	277,291
3049	Hopkins Ridge Wind Plant	550	Rents	738,213	773,422	726,765	733,996
3049	Hopkins Ridge Wind Plant	551	Maintenance Supervision and Engineering	100,097	120,071	121,297	108,162
3049	Hopkins Ridge Wind Plant	552	Maintenance of Structures	5,522	5,147	6,178	10,173
3049	Hopkins Ridge Wind Plant	553	Maintenance of Generating and Electric Plant	2,792,535	2,649,954	3,145,619	3,314,830
3049	Hopkins Ridge Wind Plant	554	Maint of Misc Generating Plant	12,713	29,695	82,312	62,407
3049	Hopkins Ridge Wind Plant	556	System Control and Load Dispatching	17,100	19,950	34,221	34,200
	Hopkins Ridge Wind Plant Total			**4,134,715**	**4,452,872**	**5,136,894**	**5,053,111**
3050	Crystal Mtn. Therm Plant	546	Other Power Supervision & Engineering	35,195	8,884	3,985	1,480
3050	Crystal Mtn. Therm Plant	548	Generation Expense	343,890	106,134	79,532	39,008
3050	Crystal Mtn. Therm Plant	549	Misc Other Power Generation Expense	9,736	40,703	21,983	3,759
3050	Crystal Mtn. Therm Plant	551	Maintenance Supervision and Engineering	18,492	187	5,017	18,955
3050	Crystal Mtn. Therm Plant	552	Maintenance of Structures	1,872	1,425	4,724	8,701
3050	Crystal Mtn. Therm Plant	553	Maintenance of Generating and Electric Plant	24,038	160,626	165,574	39,341
3050	Crystal Mtn. Therm Plant	554	Maint of Misc Generating Plant	(77,403)	2,025,183	(1,208,751)	0
	Crystal Mtn. Therm Plant Total			**355,820**	**2,343,141**	**(927,935)**	**111,244**
3052	Whitehorn Unit 1	546	Other Power Supervision & Engineering	0	0	0	0
3052	Whitehorn Unit 1	549	Misc Other Power Generation Expense	0	0	0	118
3052	Whitehorn Unit 1	554	Maint of Misc Generating Plant	0	0	0	0
	Whitehorn Unit 1 Total			**0**	**0**	**0**	**118**
3053	Whitehorn Units 2&3	546	Other Power Supervision & Engineering	126,152	559,600	126,477	210,302
3053	Whitehorn Units 2&3	548	Generation Expense	114,382	67,373	48,214	213,707
3053	Whitehorn Units 2&3	549	Misc Other Power Generation Expense	130,200	278,516	257,231	368,979
3053	Whitehorn Units 2&3	550	Rents	1,740,147	1,739,882	144,986	0
3053	Whitehorn Units 2&3	551	Maintenance Supervision and Engineering	17,920	47,098	41,940	12,360
3053	Whitehorn Units 2&3	552	Maintenance of Structures	102,225	72,341	487,175	69,626
3053	Whitehorn Units 2&3	553	Maintenance of Generating and Electric Plant	752,431	4,702,883	308,510	233,092
3053	Whitehorn Units 2&3	554	Maint of Misc Generating Plant	(590,855)	17,010	126,237	(24,172)
	Whitehorn Units 2&3 Total			**2,392,601**	**7,484,704**	**1,540,769**	**1,083,894**
3054	Frederickson 1&2	535	Hydraulic Operation Supv & Engineering	0	0	0	0
3054	Frederickson 1&2	546	Other Power Supervision & Engineering	132,786	137,107	122,825	208,004
3054	Frederickson 1&2	548	Generation Expense	247,802	177,906	131,730	291,768
3054	Frederickson 1&2	549	Misc Other Power Generation Expense	416,559	190,213	266,863	328,062
3054	Frederickson 1&2	551	Maintenance Supervision and Engineering	20,698	19,120	56,725	11,900
3054	Frederickson 1&2	552	Maintenance of Structures	73,858	327,145	16,266	750,364
3054	Frederickson 1&2	553	Maintenance of Generating and Electric Plant	472,855	386,845	517,779	5,278,050
3054	Frederickson 1&2	554	Maint of Misc Generating Plant	684,506	63,151	139,093	41,675
	Frederickson 1&2 Total			**2,049,064**	**1,301,487**	**1,251,281**	**6,909,823**
3055	Fredonia Units 1&2	546	Other Power Supervision & Engineering	67,948	24,758	9,979	132,699
3055	Fredonia Units 1&2	548	Generation Expense	54,469	118,992	207,585	196,740
3055	Fredonia Units 1&2	549	Misc Other Power Generation Expense	73,832	74,332	308,427	292,041
3055	Fredonia Units 1&2	550	Rents	22	0	0	0
3055	Fredonia Units 1&2	551	Maintenance Supervision and Engineering	38,477	22,744	22,423	29,298
3055	Fredonia Units 1&2	552	Maintenance of Structures	347,793	0	106,994	10,132
3055	Fredonia Units 1&2	553	Maintenance of Generating and Electric Plant	393,881	150,064	280,842	2,033,583
3055	Fredonia Units 1&2	554	Maint of Misc Generating Plant	33,447	135,114	29,562	113,902
	Fredonia Units 1&2 Total			**1,009,869**	**526,004**	**965,812**	**2,808,395**
3056	Encogen Thermal Plant	500	Operation Supervision & Engineering	45,947	93,718	23,134	54,338
3056	Encogen Thermal Plant	502	Steam Operations Expense	1,144,657	38,963	0	306,368
3056	Encogen Thermal Plant	505	Steam Electric Expense	0	58,359	61,646	33,518
3056	Encogen Thermal Plant	506	Misc Steam Power Expense	122,366	560	1,492	10,138

Attachment A
PSE Resp PC DR26

PSE Generation Operation and Maintenance Expense by FERC Account

3056	Encogen Thermal Plant	507	Rents	17,780	0	0	0
3056	Encogen Thermal Plant	510	Maintenance Supervision and Engineering Exp	87,788	22,167	391	0
3056	Encogen Thermal Plant	511	Maintenance of Structures	938	0	0	21,453
3056	Encogen Thermal Plant	512	Maintenance of Boiler Plant	130,793	260,392	420,851	302,583
3056	Encogen Thermal Plant	513	Maintenance of Electric Plant	1,041,189	(118,609)	12,076	150,104
3056	Encogen Thermal Plant	514	Maintenance of Misc Steam Electric Plant	25,456	10,074	20,093	9,776
3056	Encogen Thermal Plant	546	Other Power Supervision & Engineering	121,965	53,976	93,562	255,419
3056	Encogen Thermal Plant	548	Generation Expense	348,013	1,662,546	1,754,915	1,521,199
3056	Encogen Thermal Plant	549	Misc Other Power Generation Expense	398,044	532,975	398,560	682,438
3056	Encogen Thermal Plant	550	Rents	15,700	2,446	0	0
3056	Encogen Thermal Plant	551	Maintenance Supervision and Engineering	40,043	62,224	96,930	19,057
3056	Encogen Thermal Plant	552	Maintenance of Structures	53,279	561,171	(2,861)	26,646
3056	Encogen Thermal Plant	553	Maintenance of Generating and Electric Plant	256,218	121,109	2,343,204	630,450
3056	Encogen Thermal Plant	554	Maint of Misc Generating Plant	63,265	266,135	681,599	164,667
	Encogen Thermal Plant Total			**3,913,443**	**3,628,208**	**5,905,591**	**4,188,153**
3057	Fredonia Units 3&4	546	Other Power Supervision & Engineering	0	75,552	161,488	155,103
3057	Fredonia Units 3&4	548	Generation Expense	66,972	91,228	169,093	249,143
3057	Fredonia Units 3&4	549	Misc Other Power Generation Expense	63,514	78,791	157,322	29,123
3057	Fredonia Units 3&4	550	Rents	6,623,509	5,295,052	4,008,057	21,639
3057	Fredonia Units 3&4	551	Maintenance Supervision and Engineering	27,414	2,737	179,227	(19,922)
3057	Fredonia Units 3&4	552	Maintenance of Structures	0	659	71	0
3057	Fredonia Units 3&4	553	Maintenance of Generating and Electric Plant	1,581,869	316,961	631,227	326,824
3057	Fredonia Units 3&4	554	Maint of Misc Generating Plant	5,913	39,913	82,890	8,791
	Fredonia Units 3&4 Total			**8,369,191**	**5,900,894**	**5,389,375**	**770,701**
3061	Wild Horse Wind Plant	546	Other Power Supervision & Engineering	206,336	432,017	576,174	590,121
3061	Wild Horse Wind Plant	549	Misc Other Power Generation Expense	595,211	844,509	700,633	853,367
3061	Wild Horse Wind Plant	550	Rents	2,545,576	2,837,142	2,346,503	2,498,336
3061	Wild Horse Wind Plant	551	Maintenance Supervision and Engineering	51,420	124,488	207,028	145,931
3061	Wild Horse Wind Plant	552	Maintenance of Structures	22,272	36,547	29,588	12,587
3061	Wild Horse Wind Plant	553	Maintenance of Generating and Electric Plant	5,527,545	5,750,391	6,030,547	7,189,915
3061	Wild Horse Wind Plant	554	Maint of Misc Generating Plant	209,079	67,821	74,561	109,976
3061	Wild Horse Wind Plant	556	System Control and Load Dispatching	5,700	0	11,400	34,200
	Wild Horse Wind Plant Total			**9,163,138**	**10,092,915**	**9,976,433**	**11,434,433**
3062	Goldendale Thermal Plant	500	Operation Supervision & Engineering	0	108,545	43,332	63
3062	Goldendale Thermal Plant	502	Steam Operations Expense	0	0	0	405,668
3062	Goldendale Thermal Plant	505	Steam Electric Expense	0	1,444,716	2,013,408	906,258
3062	Goldendale Thermal Plant	506	Misc Steam Power Expense	0	2,690	14,389	21,680
3062	Goldendale Thermal Plant	510	Maintenance Supervision and Engineering Exp	0	32,972	42,404	0
3062	Goldendale Thermal Plant	511	Maintenance of Structures	0	33,516	13,612	29,314
3062	Goldendale Thermal Plant	512	Maintenance of Boiler Plant	0	195,069	830,424	186,110
3062	Goldendale Thermal Plant	513	Maintenance of Electric Plant	0	39,765	42,738	156,608
3062	Goldendale Thermal Plant	514	Maintenance of Misc Steam Electric Plant	0	71,835	122,958	21,594
3062	Goldendale Thermal Plant	546	Other Power Supervision & Engineering	3,422	120,651	93,409	50,198
3062	Goldendale Thermal Plant	548	Generation Expense	2,271,638	2,104,357	1,553,769	2,549,483
3062	Goldendale Thermal Plant	549	Misc Other Power Generation Expense	12,884	460,264	643,178	451,803
3062	Goldendale Thermal Plant	551	Maintenance Supervision and Engineering	17,475	76,658	48,230	19,776
3062	Goldendale Thermal Plant	552	Maintenance of Structures	0	7,731	0	18,223
3062	Goldendale Thermal Plant	553	Maintenance of Generating and Electric Plant	2,180,923	1,924,302	1,018,554	1,639,331
3062	Goldendale Thermal Plant	554	Maint of Misc Generating Plant	(215,968)	199,171	501,363	107,292
	Goldendale Thermal Plant Total			**4,270,374**	**6,822,241**	**6,981,769**	**6,563,400**
3063	Sumas Thermal Plant	500	Operation Supervision & Engineering	0	43,032	3,363	21,701
3063	Sumas Thermal Plant	502	Steam Operations Expense	0	0	0	387,743
3063	Sumas Thermal Plant	505	Steam Electric Expense	0	68,621	342,666	14,037
3063	Sumas Thermal Plant	506	Misc Steam Power Expense	0	5,060	8,007	466
3063	Sumas Thermal Plant	510	Maintenance Supervision and Engineering Exp	0	86	0	0
3063	Sumas Thermal Plant	511	Maintenance of Structures	0	0	5,603	104,336
3063	Sumas Thermal Plant	512	Maintenance of Boiler Plant	0	13,220	451,314	602,596
3063	Sumas Thermal Plant	513	Maintenance of Electric Plant	0	5,225	14,863	379,719
3063	Sumas Thermal Plant	514	Maintenance of Misc Steam Electric Plant	0	899	1,082	3,153

3063	Sumas Thermal Plant	546	Other Power Supervision & Engineering	0	89,485	154,445	300,756
3063	Sumas Thermal Plant	548	Generation Expense	0	845,747	1,769,654	1,825,016
3063	Sumas Thermal Plant	549	Misc Other Power Generation Expense	0	326,241	643,328	575,770
3063	Sumas Thermal Plant	551	Maintenance Supervision and Engineering	0	2,277	20,945	7,168
3063	Sumas Thermal Plant	552	Maintenance of Structures	0	33	0	355
3063	Sumas Thermal Plant	553	Maintenance of Generating and Electric Plant	0	91,013	458,586	1,201,126
3063	Sumas Thermal Plant	554	Maint of Misc Generating Plant	0	75,848	127,998	12,969
	Sumas Thermal Plant Total			**0**	**1,566,788**	**4,001,854**	**5,436,912**
3064	Mint Farm Plant	500	Operation Supervision & Engineering	0	0	86,008	112,518
3064	Mint Farm Plant	502	Steam Operations Expense	0	0	0	208,903
3064	Mint Farm Plant	505	Steam Electric Expense	0	0	1,197,783	507,299
3064	Mint Farm Plant	506	Misc Steam Power Expense	0	0	1,501	17,153
3064	Mint Farm Plant	511	Maintenance of Structures	0	0	0	144,428
3064	Mint Farm Plant	512	Maintenance of Boiler Plant	0	0	73,584	732,332
3064	Mint Farm Plant	513	Maintenance of Electric Plant	0	0	23,723	1,275,100
3064	Mint Farm Plant	514	Maintenance of Misc Steam Electric Plant	0	0	26,791	192,223
3064	Mint Farm Plant	546	Other Power Supervision & Engineering	0	0	141,583	184,261
3064	Mint Farm Plant	548	Generation Expense	0	0	1,448,807	2,355,733
3064	Mint Farm Plant	549	Misc Other Power Generation Expense	0	0	839,650	816,082
3064	Mint Farm Plant	551	Maintenance Supervision and Engineering	0	0	49,442	12,089
3064	Mint Farm Plant	552	Maintenance of Structures	0	0	0	15,321
3064	Mint Farm Plant	553	Maintenance of Generating and Electric Plant	0	0	971,919	1,435,391
3064	Mint Farm Plant	554	Maint of Misc Generating Plant	0	31,475	666,968	(38,719)
	Mint Farm Plant Total			**0**	**31,475**	**5,527,761**	**7,970,116**
3901	Undistributed	535	Hydraulic Operation Supv & Engineering	159,367	491,755	981,596	1,050,346
3901	Undistributed	539	Misc Hyd Power Generation Expense	4,601	260,342	335,171	299,435
3901	Undistributed	541	Hyd Maint Supervision & Engineering	0	54,728	0	629
3901	Undistributed	546	Other Power Supervision & Engineering	689,541	1,172,911	1,208,356	1,432,806
3901	Undistributed	549	Misc Other Power Generation Expense	10,945	199,026	264,890	323,356
3901	Undistributed	550	Rents	0	114,375	1,372,500	1,130,625
3901	Undistributed	553	Maintenance of Generating and Electric Plant	0	0	0	0
3901	Undistributed	554	Maint of Misc Generating Plant	128,091	53,222	111,597	111,095
	Undistributed Total			**992,545**	**2,346,359**	**4,274,111**	**4,348,292**
3903	Centralia	506	Misc Steam Power Expense	11,214	9,795	1,900	683
	Centralia Total			**11,214**	**9,795**	**1,900**	**683**
3904	Colstrip Units 1&2	500	Operation Supervision & Engineering	58,555	77,913	56,925	61,750
3904	Colstrip Units 1&2	502	Steam Operations Expense	3,253,663	3,333,797	3,798,634	4,155,364
3904	Colstrip Units 1&2	505	Steam Electric Expense	89,316	74,472	80,909	97,082
3904	Colstrip Units 1&2	506	Misc Steam Power Expense	4,455,639	11,283,450	4,860,559	1,532,495
3904	Colstrip Units 1&2	507	Rents	48	5,765	17,250	9,047
3904	Colstrip Units 1&2	510	Maintenance Supervision and Engineering Exp	836,160	955,091	895,627	827,101
3904	Colstrip Units 1&2	511	Maintenance of Structures	862,248	698,097	815,414	1,124,651
3904	Colstrip Units 1&2	512	Maintenance of Boiler Plant	4,721,377	7,418,214	7,138,225	5,176,409
3904	Colstrip Units 1&2	513	Maintenance of Electric Plant	913,923	1,873,015	1,434,351	578,523
3904	Colstrip Units 1&2	514	Maintenance of Misc Steam Electric Plant	933,501	1,529,780	1,491,802	1,264,419
	Colstrip Units 1&2 Total			**16,124,429**	**27,249,596**	**20,589,697**	**14,826,840**
3905	Colstrip Units 3&4	500	Operation Supervision & Engineering	48,104	64,129	45,849	50,554
3905	Colstrip Units 3&4	502	Steam Operations Expense	2,235,306	2,284,715	2,287,157	2,502,216
3905	Colstrip Units 3&4	505	Steam Electric Expense	74,317	50,121	43,023	87,816
3905	Colstrip Units 3&4	506	Misc Steam Power Expense	2,757,264	5,985,284	3,676,834	3,001,235
3905	Colstrip Units 3&4	507	Rents	56,440	49,870	53,807	32,766
3905	Colstrip Units 3&4	510	Maintenance Supervision and Engineering Exp	685,754	614,707	629,166	589,309
3905	Colstrip Units 3&4	511	Maintenance of Structures	821,372	734,251	793,311	847,753
3905	Colstrip Units 3&4	512	Maintenance of Boiler Plant	5,770,325	4,153,469	5,925,688	4,412,221
3905	Colstrip Units 3&4	513	Maintenance of Electric Plant	1,080,014	520,661	809,417	538,076
3905	Colstrip Units 3&4	514	Maintenance of Misc Steam Electric Plant	928,045	781,195	1,008,964	863,749
	Colstrip Units 3&4 Total			**14,456,942**	**15,238,402**	**15,273,216**	**12,925,695**
3936	White River	535	Hydraulic Operation Supv & Engineering	3,615	1,507	66	0
3936	White River	537	Hydraulic Expenses	(5,000)	(5,000)	0	0
3936	White River	544	Maint of Electric Plant	36	1,874	0	0

Attachment A
PSE Resp PC DR26

PSE Generation Operation and Maintenance Expense by FERC Account

3936	White River	545	Maintenance of Hydraulic Production Plant	0	206	206	0
	White River Total			**(1,349)**	**(1,413)**	**272**	**0**
3951	South Whidbey	551	Maintenance Supervision and Engineering	0	(30)	0	0
	South Whidbey Total			**0**	**(30)**	**0**	**0**
3960	Freddy 1	500	Operation Supervision & Engineering	0	0	262,054	283,674
3960	Freddy 1	505	Steam Electric Expense	0	0	797,868	803,256
3960	Freddy 1	506	Misc Steam Power Expense	0	0	139,943	90,194
3960	Freddy 1	510	Maintenance Supervision and Engineering Exp	0	0	302,714	326,573
3960	Freddy 1	512	Maintenance of Boiler Plant	0	0	357,556	286,376
3960	Freddy 1	513	Maintenance of Electric Plant	0	0	325,348	288,998
3960	Freddy 1	514	Maintenance of Misc Steam Electric Plant	0	0	205,827	92,031
3960	Freddy 1	546	Other Power Supervision & Engineering	1,688,973	1,935,688	152,065	155,814
3960	Freddy 1	548	Generation Expense	0	0	238,487	252,749
3960	Freddy 1	549	Misc Other Power Generation Expense	0	0	211,692	158,229
3960	Freddy 1	551	Maintenance Supervision and Engineering	2,125,004	1,983,996	429,632	394,440
3960	Freddy 1	552	Maintenance of Structures	0	0	205,785	84,631
3960	Freddy 1	553	Maintenance of Generating and Electric Plant	0	0	402,105	289,872
3960	Freddy 1	554	Maint of Misc Generating Plant	0	0	282,769	308,851
	Freddy 1 Total			**3,813,977**	**3,919,684**	**4,313,845**	**3,815,689**
9999	Syst Cntrl & Load Disp	556	System Control and Load Dispatching	1,136,086	1,388,326	1,261,725	1,698,448
	Syst Cntrl & Load Disp Total			**1,136,086**	**1,388,326**	**1,261,725**	**1,698,448**
	Grand Total			**84,775,882**	**107,906,705**	**110,955,279**	**109,258,705**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case

PUBLIC COUNSEL DATA REQUEST NO. 255

PUBLIC COUNSEL DATA REQUEST NO. 255:

Please quantify the estimated impact on the Company's cost of capital if the proposed CSA is approved. Please provide all supporting calculations and workpapers with your response.

Response:

Meaningful quantification of the proposed Conservation Savings Adjustment ("CSA") on the cost of capital is not possible. Puget Sound Energy, Inc.'s ("PSE") requested equity return is based on the cost of capital for a group of comparable utilities; the individual ratemaking components of these companies are not significant drivers of their capital costs.

The CSA, if implemented, would act to reduce attrition. PSE's cost of equity was developed using comparable companies that do not experience the level of attrition that PSE experiences. Please see PSE's Response to Public Counsel Data Request No. 240, which shows that the majority of the comparable companies used in determining PSE's cost of equity do not have mechanisms similar to the CSA.

Nothing was added to the requested return on equity to reflect PSE's greater attrition risk relative to the comparable companies. Therefore, nothing should be subtracted for the CSA implementation.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case

ICNU DATA REQUEST NO. 05.06

ICNU DATA REQUEST NO. 05.06:

With regard to the work paper DEM 0315, please provide a complete explanation on why PSE's proposed production O&M expense for Mint Farm from the test period is a reasonable amount to use for the rate year. As part of this response, explain what contract and non-contract major maintenance was performed at the plant during 2010 (along with the associated cost) and what maintenance is budgeted for the years 2012 and 2013, providing the 2012 and 2013 budgets by FERC account.

Response:

David E. Mills' power cost workpaper "WP, DEM 0315" provides a summary of the production operations and maintenance ("O&M") costs for the test and rate years, calendar 2010 and May 2012 through April 2013, respectively. This workpaper was provided in the power cost workpaper MS Excel file "DEM-WP(C) Production OM 2011GRC As-Filed.xls" submitted to the Commission on June 13, 2011 and September 1, 2011.

The production O&M expense incurred for the Mint Farm generating facility during the calendar 2010 test year, $7,970,116, is considered to be a normal level of costs to be incurred in the rate year. The Mint Farm facility was operational for the entire test year period, except for scheduled outages and occasional forced outages that occurred in the normal course of operations. Mint Farm was purchased in mid-December 2008; accordingly, Puget Sound Energy, Inc. ("PSE") has accumulated only two years of actual O&M expense for this plant (see table below).

Mint Farm Actual O&M Expense	2009	2010	Change	
Total Fixed Operations Expense	2,129,113	2,769,366	640,252	(a)
Total Variable Operations Expense	1,438,316	1,445,387	7,071	
Total Preventive Maintenance Expense	1,266,343	1,183,117	(83,225)	
Total Corrective Maintenance Expense	693,988	1,268,073	574,085	(b)
Subtotal; Core Maintenance Expense	**5,527,761**	**6,665,944**	**1,138,183**	
Total Amortization Expense (Contract Major Maintenance)	0	456,270	456,270	(c)
Total Non-Contract Major Maintenance Expense	0	847,902	847,902	(d)
Total	**5,527,761**	**7,970,116**	**2,442,355**	

(a) Increase due to additional labor and overhead expense in 2010 as Mint Farm was not fully staffed during the first half of 2009. It is expected that the staffing level in the rate year will be consistent with the staffing in the test year.

(b) Increase due to additional corrective maintenance performed in 2010. Corrective maintenance reflects repairs and non-capital replacements of equipment that fails during the normal course of operations and it is reasonable to expect that such costs will be incurred during the rate year.

(c) Please see pages 14 and 15 of the Prefiled Direct Testimony of John H. Story, Exhibit No. ___(JHS-1T), for a discussion of rate treatment associated with contract major maintenance costs to be recovered via the deferral mechanism.

(d) Increase due to 2010 non-contract major maintenance; steam turbine summary inspection (see major maintenance discussion below).

Attached as Attachment A to PSE's Response to ICNU Data Request No. 05.06, please find the test year non-contract and contract major maintenance expense and the related deferral information for all of PSE's gas fired generators: Encogen, Fredonia Units 1-4, Frederickson, Mint Farm, Frederickson 1 (aka: Freddy 1), Goldendale and Sumas gas generation facilities.

Attached as Attachment B to PSE's Response to ICNU Data Request No. 05.06, please find contract and non-contract major maintenance expense budgeted for 2012 and 2013 for Mint Farm, Frederickson, Fredonia Units 1-4 and Sumas as requested in ICNU Data Request No.'s 05.06 through 05.09.

Major Maintenance

During this proceeding's test year, the only contract major maintenance event for Mint Farm was a Combustion Inspection performed in June 2010. The only non-contract major maintenance event was a Steam Turbine Valve Inspection "Summary Inspection" also performed in June 2010. It is normal and reasonable to assume that major maintenance on generation facilities will be performed from time to time in the future,

including the rate year. As the Commission noted in PSE's 2009 general rate case, Dockets UE-090704 and UG-090705 (consolidated), Order 11, page 60, paragraph 162:

> While the Company originally proposed to use forecasts and states that it still supports such an approach in principle, it is willing to accept the use of historical data to determine O&M costs in this proceeding. We have discussed elsewhere in this Order the Commission's longstanding preference for using the best and most representative historical data when making pro forma adjustments. This is the most reliable source of information from which to determine known and measurable changes to test year costs. Accordingly, we will use such data here. The question remains, however, as to what historic data we should use. Staff's figures are based on use of a five-year average that the Company argues do not reflect more current expense trends. Public Counsel accepts the Company's rebuttal amounts. O&M is an ongoing expense and there is no evidence that the more recent historic data upon which the Company would have us rely requires any normalizing adjustments. We accept the Company's proposals .

Test year actual major maintenance expense is a known and measurable indicator of rate year major maintenance expense *on a fleet wide basis.*

Attachment A: INCU DR No. 05.06

Source: DEM 0321; "Major Maint Summary 2011 GRC" tab

Non-Contract Major Maintenance

	Jan - Dec 2010 Major Maintenance Expensed as Incurred
Encogen Major Maintenance	
553002340 ENC Major Overhaul - Unit 3	$172,513
553003105 ENC REFURBISHMENT OF GAS TURBINE PARTS	$106,995
553005305 ENC PARTS FOR GT03 MAJOR NOT SIGNED OUT	$132,814
Encogen Total	$412,322
Fredonia Major Maintenance	
553005346 FRA UNIT 1 ROW 2 BLADE DAMAGE-(Modified HGP)	$1,794,386
Fredonia Total	$1,794,386
Frederickson Major Maintenance	
553002954 FRE FRE CT MAJOR - UNIT 1	$4,758,902
Frederickson Total	$4,758,902
Mint Farm Major Maintenance	
513000680 MTF PERFORM STEAM TURBINE VALVE INSPECTION	$847,902
Mint Farm Total	$847,902
Sumas Major Maintenance	
513003020 SMS HOT GAS PATH - STG O&M ORDER	$134,200
553006964 SMS HOT GAS PATH - CTG O&M ORDER	$211,487
Sumas Total	$345,687
Total Non-Contract Maintenance Expense	$8,159,198

Major Maintenance Covered Under LTSA/CSA

	Amortization of Contract Major Maintenance Expense included in Test Year	Contract Major Maintenance Expense Deferred During Test Year (1)
Freddy1 Amortization		
(June 2009 Major Inspection amortized over 31 months - through 12/31/11 - Note: Freddy 1 rate year based upon Capital Power budget)		
51218007 Amort 2009 HRSG Major Inspection	$35,351	$0
51318019 Amort 2009 Steam Tubogen Major Insp	$35,351	$0
55360053 Amort 2009 CT Major Insp	$35,351	$0
55460076 Amort 2009 Othr Gen Equip Major Insp	$35,351	$0
Freddy1 Total (not inlcuded in rate year. see note above)	**$141,404**	**$0**
Goldendale Amortization		
June 2009 Combustion Inspection	$354,580	$0
(June 2009 Combustion Inspection amortized over 34 months - ended 2/29/12)		
Goldendale Total	**$354,580**	**$0**
Sumas Amortization		
November 2008 Combustion Inspection	$119,333	$0
(November 2008 Combustion Inspection amortized over 42 months - through 10/31/10 -0 months of amortization in rate year)		
October 2010 Hot Gas Path Inspection	$61,034	$701,895
October 2010 Hot Gas Path Inspection amortized two months in the test year through September 2012; five months in the rate year)		
Sumas Total	**$180,368**	**$701,895**
Mint Farm Amortization		
June 2010 Combustion Inspection	$456,270	$1,499,173
(June 2010 Major Maintenance event for Combustion Inspection amortized over 23 months - ends Apr 2012)		
Mint Farm Total	**$456,270**	**$1,499,173**
Total 2010 Contract Maintenance Total	**$1,132,622**	**$2,201,068**

(1) to be amortized as noted in blue.
(2) Test Year amortization is for costs deferred prior to the test year.

Attachment B INCU DR No. 05.06

PUGET SOUND ENERGY, INC.

		FERC		Actuals 2010	Budget 2012	Budget 2013
5.6	**Mint Farm 2012 & 2013 Budgeted Maintenance Expense**					
	Mint Farm NonContract Maintenance	511		144,428	81,893	83,348
	Mint Farm NonContract Maintenance	512		732,332	144,063	322,675
	Mint Farm NonContract Maintenance	513		427,199	117,631	120,757
	Mint Farm NonContract Maintenance	514		192,223		
	Mint Farm NonContract Maintenance	551		12,089		
	Mint Farm NonContract Maintenance	552		15,321		
	Mint Farm NonContract Maintenance	553		979,121	1,355,556	1,352,184
	Mint Farm NonContract Maintenance	554		(38,719)	177,127	181,796
	Total Maintenance			2,463,993	1,876,269	2,060,761
	Mint Farm Non-Contract Major Maintenance	553		847,902	0	0
	Mint Farm Contract Major Maintenance	553	(1,2)	456,270	260,724	609,520
	Total Major Maintenance			1,304,172	260,724	609,520
	Total Maintenance Expense Mint Farm			3,768,165	2,136,993	2,670,281
5.7	**Frederickson 2012 & 2013 Budgeted Maintenance Expense**					
	Frederickson Non-Contract Maintenance	551		11,900	67,992	92,101
	Frederickson Non-Contract Maintenance	552		750,364	0	0
	Frederickson Non-Contract Maintenance	553		519,148	334,462	392,202
	Frederickson Non-Contract Maintenance	554		41,675	87,302	125,342
	Total Maintenance			1,323,087	489,756	609,644
	Frederickson Non-Contract Major Maintenance	553		4,758,902	(1,500)	0
	Total Major Maintenance			4,758,902	(1,500)	0
	Total Maintenance Expense Frederickson			6,081,989	488,256	609,644
5.8	**Fredonia 2012 & 2013 Budgeted Maintenance Expense**					
	Fredonia Non-Contract Maintenance	551		9,376	63,100	68,713
	Fredonia Non-Contract Maintenance	552		10,132	0	0
	Fredonia Non-Contract Maintenance	553		566,021	1,144,172	1,070,763
	Fredonia Non-Contract Maintenance	554		122,693	331,200	337,779
	Total Maintenance			708,223	1,538,473	1,477,254
	Fredonia Non-Contract Major Maintenance	553		1,794,386	320,000	0
	Total Major Maintenance			1,794,386	320,000	0
	Total Maintenance Expense Fredonia			2,502,609	1,858,473	1,477,254
5.9	**Sumas 2012 & 2013 Budgeted Maintenance Expense**					
	Sumas Non Contract Maintenace	511		104,336	88,016	90,405
	Sumas Non Contract Maintenace	512		602,596	356,310	189,319
	Sumas Non Contract Maintenace	513		245,518	137,663	197,349
	Sumas Non Contract Maintenace	514		3,153	0	0
	Sumas Non Contract Maintenace	551		7,168	0	0
	Sumas Non Contract Maintenace	552		355	0	0
	Sumas Non Contract Maintenace	553		809,272	543,098	480,563
	Sumas Non Contract Maintenace	554		12,969	383,714	744,034
	Total Maintenance			1,785,367	1,508,801	1,701,669
	Sumas NonContract Major Maintenance	553		345,687	0	330,000
	Sumas Contract Major Maintenance	553	(1)	180,368	274,655	0
	Total Major Maintenance			526,054	274,655	330,000
	Total Maintenance Expense Sumas			2,311,422	1,783,455	2,031,669
	tal Maintenance for Selected Plants per ICNU DR No's 5.06 - 5.09			14,664,185	6,267,177	6,788,849

(1) -Amortization of deferred prepaid maintenance.

(2) -Prepaid expense budgedted to be deferred under CSA/LTSA:

	2012	2,013
Goldendale Combustion Inspection	0	1,727,072
Mint Farm Hot Gas Path Inspection	0	1,653,436

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case

ICNU DATA REQUEST NO. 05.07

ICNU DATA REQUEST NO. 05.07:

With regard to the work paper DEM 0315, please provide a complete explanation on why PSE's proposed production O&M expense for Frederickson from the test period is a reasonable amount to use for the rate year. As part of this response, explain what contract and non-contract major maintenance was performed at the plant during 2010 (along with the associated cost) and what maintenance is budgeted for the years 2012 and 2013, providing the 2012 and 2013 budgets by FERC account.

Response:

David E. Mills's power cost workpaper "WP, DEM 0315" provides a summary of the production operations and maintenance ("O&M") costs for the test and rate years, calendar 2010 and May 2012 through April 2013, respectively. This workpaper was provided in the power cost workpaper MS Excel file "DEM-WP(C) Production OM 2011GRC As-Filed.xls" submitted to the Commission on June 13, 2011 and September 1, 2011.

The production O&M expense incurred for the Frederickson generating facility during the calendar 2010 test year, $6,909,823, is considered to be a normal level of costs to be incurred in the rate year. The Frederickson facility was operational for the entire test year period, except for scheduled outages and occasional forced outages that occurred in the normal course of operations. The following table lists actual O&M expense at Frederickson for the years 2009 and 2010.

Frederickson Actual O&M Expense	2009	2010	Difference	
Total Fixed Operations Expense	479,148	811,015	331,867	(a)
Total Variable Operations Expense	46,031	26,492	(19,539)	
Total Preventive Maintenance Expense	527,266	336,049	(191,217)	
Total Corrective Maintenance Expense	198,836	131,354	(67,482)	
Subtotal; Core Maintenance Expense	**1,251,281**	**1,304,910**	**53,629**	

Supplemental Maintenance Project Expense	0	846,012	846,012	(b)
Total Non-Contract Major Maintenance Expense	0	4,758,902	4,758,902	(c)
Total	**1,251,281**	**6,909,823**	**5,658,542**	

(a) Increase due to additional labor and overhead expense in 2010. It is expected that the staffing level in the rate year will be consistent with the staffing in the test year.

(b) Supplemental maintenance project performed in 2010 (spill containment improvements around fuel tank). Supplemental maintenance projects involve repairs or non-capital additions that are not considered to be a component of core maintenance expense. It is normal and reasonable to assume that supplemental maintenance projects will be performed on a fleet wide basis from time to time in the future, including the rate year.

(c) Increase due to 2010 non-contract major maintenance; a major inspection of the unit #1 combustion turbine (see major maintenance discussion below).

Please see Attachment A to Puget Sound Energy, Inc.'s ("PSE") Response to ICNU Data Request No. 05.06 for the test year non-contract and contract major maintenance expense and the related deferral information for all of PSE's gas fired generators: Encogen, Fredonia Units 1-4, Frederickson, Mint Farm, Frederickson 1 (aka: Freddy 1), Goldendale and Sumas gas generation facilities.

Please see Attachment B to PSE's Response to ICNU Data Request No. 05.06 for contract and non-contract major maintenance expense budgeted for 2012 and 2013 for Mint Farm, Frederickson, Fredonia Units 1-4 and Sumas as requested in ICNU Data Request No's 05.06 through 05.09.

Major Maintenance

During the test year, the only non-contract major maintenance event for Frederickson was a combustion turbine Major Inspection performed in October 2010. It is normal and reasonable to assume that major maintenance on generation facilities will be performed

from time to time in the future, including the rate year. As the Commission noted in PSE's 2009 general rate case, Dockets UE-090704 and UG-090705 (consolidated), Order 11, page 60, paragraph 162:

> While the Company originally proposed to use forecasts and states that it still supports such an approach in principle, it is willing to accept the use of historical data to determine O&M costs in this proceeding. We have discussed elsewhere in this Order the Commission's longstanding preference for using the best and most representative historical data when making pro forma adjustments. This is the most reliable source of information from which to determine known and measurable changes to test year costs. Accordingly, we will use such data here. The question remains, however, as to what historic data we should use. Staff's figures are based on use of a five-year average that the Company argues do not reflect more current expense trends. Public Counsel accepts the Company's rebuttal amounts. O&M is an ongoing expense and there is no evidence that the more recent historic data upon which the Company would have us rely requires any normalizing adjustments. We accept the Company's proposals.

Test year actual major maintenance expense is a known and measurable indicator of rate year major maintenance expense *on a fleet wide basis.*

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case

ICNU DATA REQUEST NO. 05.08

ICNU DATA REQUEST NO. 05.08:

With regard to the work paper DEM 0315, please provide a complete explanation on why PSE's proposed production O&M expense for Fredonia 1-4 from the test period is a reasonable amount to use for the rate year. As part of this response, explain what contract and non-contract major maintenance was performed at the plant during 2010 (along with the associated cost) and what maintenance is budgeted for the years 2012 and 2013, providing the 2012 and 2013 budgets by FERC account.

Response:

David E. Mills' power cost workpaper "WP, DEM 0315" provides a summary of the production operations and maintenance ("O&M") costs for the test and rate years, calendar 2010 and May 2012 through April 2013, respectively. This workpaper was provided in the power cost workpaper MS Excel file "DEM-WP(C) Production OM 2011GRC As-Filed.xls" submitted to the Commission on June 13, 2011 and September 1, 2011.

The production O&M expense incurred for the Fredonia 1-4 generating facility during the calendar 2010 test year, $3,579,096, is considered to be a normal level of costs to be incurred in the rate year. The Fredonia 1-4 facility was operational for the entire test year period, except for scheduled outages and occasional forced outages that occurred in the normal course of operations. The following table lists actual O&M expense at Fredonia 1-4 for the years 2009 and 2010.

Fredonia Actual O&M Expense	2009	2010	Difference	
Total Fixed Operations Expense	789,238	995,803	206,565	
Total Variable Operations Expense	210,928	59,046	(151,882)	
Total Preventive Maintenance Expense	418,012	372,207	(45,805)	
Total Corrective Maintenance Expense	537,600	336,016	(201,584)	
Subtotal; Core Maintenance Expense	**1,955,778**	**1,763,072**	**(192,706)**	
Lease Expense (pre PSE acquisition)	4,008,057	21,639	(3,986,418)	(a)
Supplemental Maintenance Project Expense	147,969	0	(147,969)	(b)
Total Non-Contract Major Maintenance Expense	243,383	1,794,386	1,551,003	(c)
Total	**6,355,187**	**3,579,096**	**(2,776,091)**	

(a) Expense associated with Fredonia units 3 & 4 lease prior to PSE's acquisition of the plant.

(b) Supplemental maintenance projects performed in 2010. Supplemental maintenance projects involve repairs or non-capital additions that are not considered to be a component of core maintenance expense. It is normal and reasonable to assume that supplemental maintenance projects will be performed on a fleet wide basis from time to time in the future, including the rate year.

(c) Increase due to 2010 non-contract major maintenance; repairs to Unit #1 turbine blades (see major maintenance discussion below).

Please see Attachment A to Puget Sound Energy, Inc.'s ("PSE") Response to ICNU Data Request No. 05.06 for the test year non-contract and contract major maintenance expense and the related deferral information for all of PSE's gas fired generators: Encogen, Fredonia Units 1-4, Frederickson, Mint Farm, Frederickson 1 (aka: Freddy 1), Goldendale and Sumas gas generation facilities.

Please see Attachment B to PSE's Response to ICNU Data Request No. 05.06 for contract and non-contract major maintenance expense budgeted for 2012 and 2013 for Mint Farm, Frederickson, Fredonia Units 1-4 and Sumas as requested in ICNU Data Request No's 05.06 through 05.09.

Major Maintenance

The only non-contract major maintenance event that occurred at Fredonia during the test year involved repairs to Unit #1 turbine blades performed in October, 2010. It is normal and reasonable to assume that major maintenance on generation facilities will be performed from time to time in the future, including the rate year. As the Commission noted in PSE's 2009 general rate case, Dockets UE-090704 and UG-090705 (consolidated), Order 11, page 60, paragraph 162:

> While the Company originally proposed to use forecasts and states that it still supports such an approach in principle, it is willing to accept the use of historical data to determine O&M costs in this proceeding. We have discussed elsewhere in this Order the Commission's longstanding preference for using the best and most representative historical data when making pro forma adjustments. This is the most reliable source of information from which to determine known and measurable changes to test year costs. Accordingly, we will use such data here. The question remains, however, as to what historic data we should use. Staff's figures are based on use of a five-year average that the Company argues do not reflect more current expense trends. Public Counsel accepts the Company's rebuttal amounts. O&M is an ongoing expense and there is no evidence that the more recent historic data upon which the Company would have us rely requires any normalizing adjustments. We accept the Company's proposals.

Test year actual major maintenance expense is a known and measurable indicator of rate year major maintenance expense *on a fleet wide basis*.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case

ICNU DATA REQUEST NO. 05.09

ICNU DATA REQUEST NO. 05.09:

With regard to the work paper DEM 0315, please provide a complete explanation on why PSE's proposed production O&M expense for Sumas from the test period is a reasonable amount to use for the rate year. As part of this response, explain what contract and non-contract major maintenance was performed at the plant during 2010 (along with the associated cost) and what maintenance is budgeted for the years 2012 and 2013, providing the 2012 and 2013 budgets by FERC account.

Response:

David E. Mills' power cost workpaper "WP, DEM 0315" provides a summary of the production operations and maintenance ("O&M") costs for the test and rate years, calendar 2010 and May 2012 through April 2013, respectively. This workpaper was provided in the power cost workpaper MS Excel file "DEM-WP(C) Production OM 2011GRC As-Filed.xls" submitted to the Commission on June 13, 2011 and September 1, 2011.

The production O&M expense incurred for the Sumas generating facility during the calendar 2010 test year, $5,436,912, is considered to be a normal level of costs to be incurred in the rate year. The Sumas facility was operational for the entire test year period, except for scheduled outages and occasional forced outages that occurred in the normal course of operations. Sumas was purchased in mid- 2008; accordingly, Puget Sound Energy, Inc. ("PSE") has accumulated only two and one half years of actual O&M expense for this plant. The following table lists actual O&M expense at Fredonia 1-4 for the years 2009 and 2010.

Sumas Actual O&M Expense	2009	2010	difference	
Fixed Operation Expense	2,363,637	2,666,625	302,989	(a)
Variable Operations Expense	564,502	466,033	(98,470)	
Preventive Maintenance Expense	552,904	1,139,506	586,601	(b)
Corrective Maintenance Expense	520,810	638,694	117,883	
Subtotal; Core Maintenance	**4,001,854**	**4,910,857**	**909,004**	
Contract Major Maintenance	0	180,368	180,368	(c)
Non-Contract Major Maintenance	0	345,687	345,687	(d)
Total O&M Expense	**4,001,854**	**5,436,912**	**1,435,058**	

(a) Increase due to additional labor and overhead expense in 2010. Support staff positions were filled in 2010. It is expected that the staffing level in the rate year will be consistent with the staffing in the test year.

(b) Increase due to additional preventive and corrective maintenance performed in 2010 associated with the extended outage in October. Corrective maintenance reflects repairs and non-capital replacements of equipment that fails during the normal course of operations and it is reasonable to expect that such costs will be incurred during the rate year.

(c) Please see pages 14 and 15 of the Prefiled Direct Testimony of John H. Story, Exhibit No. ___(JHS-1T), for a discussion of rate treatment associated with contract major maintenance costs to be recovered via the deferral mechanism.

(d) Increase due to 2010 non-contract major maintenance (see major maintenance discussion below).

Please see Attachment A to PSE's Response to ICNU Data Request No. 05.06 for the test year non-contract and contract major maintenance expense and the related deferral information for all of PSE's gas fired generators: Encogen, Fredonia Units 1-4, Frederickson, Mint Farm, Frederickson 1 (aka: Freddy 1), Goldendale and Sumas gas generation facilities.

Please see Attachment B to PSE's Response to ICNU Data Request No. 05.06 for contract and non-contract major maintenance expense budgeted for 2012 and 2013 for Mint Farm, Frederickson, Fredonia Units 1-4 and Sumas as requested in ICNU Data Request No's 05.06 through 05.09.

Major Maintenance

During the test year, the only contract major maintenance event was a Hot Gas Path Inspection performed in October, 2010. The non-contract major maintenance events involved maintenance in support of the Hot Gas Path Inspection outside the scope of

the Contractual Service Agreement. The only non-contract major maintenance event was a Steam Turbine Valve Inspection "Summary Inspection" also performed in June 2010. It is normal and reasonable to assume that major maintenance on generation facilities will be performed from time to time in the future, including the rate year. As the Commission noted in PSE's 2009 general rate case, Dockets UE-090704 and UG-090705 (consolidated), Order 11, page 60, paragraph 162:

> While the Company originally proposed to use forecasts and states that it still supports such an approach in principle, it is willing to accept the use of historical data to determine O&M costs in this proceeding. We have discussed elsewhere in this Order the Commission's longstanding preference for using the best and most representative historical data when making pro forma adjustments. This is the most reliable source of information from which to determine known and measurable changes to test year costs. Accordingly, we will use such data here. The question remains, however, as to what historic data we should use. Staff's figures are based on use of a five-year average that the Company argues do not reflect more current expense trends. Public Counsel accepts the Company's rebuttal amounts. O&M is an ongoing expense and there is no evidence that the more recent historic data upon which the Company would have us rely requires any normalizing adjustments. We accept the Company's proposals.

Test year actual major maintenance expense is a known and measurable indicator of rate year major maintenance expense *on a fleet wide basis*.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case

ICNU DATA REQUEST NO. 05.10

ICNU DATA REQUEST NO. 05.10:

With regard to the workpaper DEM 0315, please provide a complete explanation on what costs make up the Other category (test period $4,502,816) and explain why PSE's proposed production O&M expense for this line item is a reasonable amount to use for the rate year. As part of this response, explain what services were performed during 2010 and what amount is budgeted for the years 2012 and 2013, providing the 2012 and 2013 budgets by FERC account.

Response:

David E. Mills' power cost workpaper entitled "WP, DEM 0315" provides a summary of Puget Sound Energy, Inc.'s ("PSE") production operations and maintenance ("O&M") costs for this proceeding's test and rate years, calendar 2010 and May 2012 through April 2013, respectively. Other production O&M expenses totaled $4,502,816 for the test year. The test year level of other production O&M costs is considered to be indicative of a normal level of costs to be incurred in the rate year because there were no expenses recorded during the test year that require a normalizing adjustment. The Commission defined a normalizing adjustment in paragraph 24 of Order 11 in PSE's 2009 general rate case, Dockets UE-090704 and UG-090705, as "certain expenses recorded during the test period [which are] extraordinary and should be adjusted to levels that are more indicative of ordinary levels for the expenses in question".

Attached as Attachment A to PSE's Response to ICNU Data Request No. 05.10, please find a list of other production O&M costs for the test year, including budgeted costs for calendars 2012 and 2013, and an explanation of costs by work breakdown structure ("WBS") element. Since PSE budgets by WBS element and all orders roll up to a WBS element, Attachment A to PSE's Response to ICNU Data Request No. 05.10 also provides the mapping of the test year costs by order to WBS element.

PUGET SOUND ENERGY, INC. OTHER PRODUCTION OPERATIONS AND MAINTENANCE COSTS

FERC Code	WBS Elements	WBS Description	2010 Actuals	2012 Budget	2013 Budget	Explanation
546	P.10657	Discretionary Benefit Elec other ops exp	$770,484	$0	$0	These orders are used to account for the difference between the quarterly estimated (incentive) or actual (PTO) liabilities and the overheads applied. A debit to the orders corresponds to an underaccrual and a credit to the orders represents an overaccrual. The differences are allocated based on the direct labor report.
535	P.10816	Energy prod/storage hydro generat'n ops	159,263	232,377	302,685	Labor, labor overhead, and employee expenses for Director of Hydro.
535, 539	P.10916	Plant Eng Elec hydro generation ops	10,623	23,278	23,855	This order was set up for engineering labor to assist plant staff with NERC/WECC testing of hydro plant generators.
541, 543, 544	P.10917	Plant Eng Elec hydro generation maint	629	134,588	137,926	This order number was set up to cover engineering labor applicable to hydro plant maintenance projects.
546, 549	P.10918	Plant Eng Electric other operations exp	15,616	93,323	95,637	This order was set up for engineering labor to assist plant staff with NERC/WECC testing of thermal plant generators.
535, 537, 539	S.00258	Electric Hydro Generation Operations	260,063	275,338	255,060	Labor & employee expenses associated with supporting fish and other wildlife for PSE's hydroelectric generating facilities.
549	S.00260	Electric Other Generation Operations	776	-	-	
535, 539, 546, 549	S.00270	Electric Generation Operations	545,122	500,183	687,202	Budget for Asset Management, includes labor, labor overhead and employee expenses for Asset Mgt organization.
546, 549	S.00283	Electric Other Generation Operations	233,727	430,227	436,261	Labor, labor overhead, and employee expenses for Asset Manager of Thermal.
554	S.00284	Electric Other Generation Maintenance	111,095	19,753	24,367	Labor, labor overhead, and employee expenses associated with analyst and administrative support for the Thermal organization.
546	S.00294	Electric Other Generation Operations	34,283	90,954	94,763	Labor associated with coordination of outage plans across the Thermal fleet.
535	S.00303.01	ENERGY CONTROL SYSTEMS O&M	44,330	-	-	
506, 549	S.00305	5300 - Other Energy Expense	683	-	-	
554	S.00502	Facilities-Other Generation Maintenance	4,657	-	-	
535, 556	S.00795	EIT PROGRAM - Generation O&M	8,949	-	10,000	Hydro Generation EIT expenses.
530, 539	S.00830	DAM SAFETY PLANS EXPENSE	12,188	255,514	247,434	FERC security program for hydroelectric projects.
535	S.00835	Energy Resource Compliance Hydro O&M	237,446	107,977	115,850	Labor and other costs incurred by Energy Resources Compliance for support of Hydro Compliance Program (not plant specific). Includes procedures and training, web updates and general oversight of compliance and reporting on that compliance.
546	S.00836	Energy Resource Compliance Thermal O&M	586,571	239,246	256,691	Labor and other costs incurred by Energy Resources Compliance for support of CT Compliance Program (not plant specific). Includes training development, procedure development, web updates and information and any cross-fleet compliance initiatives in support of the CT plants.
549	S.00889	DIRECTOR THERMAL RESOURCES Other Exp	6,946	-	-	
535	S.01036	Hydro gen. station operation - S&E	75,988	31,090	32,417	Costs incurred by the Safety organization, including safety training and compliance as it relates to Hydroelectric Power Generation Operation supervision and engineering functions.
546	S.01037	Other gen. station operation - S&E	252,754	248,718	259,338	Costs incurred by the Safety organization, including safety training and compliance related to Other Power Generation Operation supervision and engineering functions.
550	S.01080	PSEE Gas Storage @ JP Rental Fee	1,130,625	907,549	934,976	Jackson Prairie gas storage costs for PSE's Energy Trading business unit.
		Total	**$4,502,816**	**$3,590,116**	**$3,914,463**	

WBS Elements	Order #	WBS Description	2010 Actuals
P.10657	54601100	Discretionary Benefit Elec other ops exp	557,537
P.10657	54601102	Discretionary Benefit Elec other ops exp	212,947
P.10816	53501010	Energy prod/storage hydro generat'n ops	159,263
P.10916	53501008	Plant Eng Elec hydro generation ops	7,676
P.10916	539000900	Plant Eng Elec hydro generation ops	2,946
P.10917	541000260	Plant Eng Elec hydro generation maint	629
P.10918	54601008	Plant Eng Electric other operations exp	10,327
P.10918	549000620	Plant Eng Electric other operations exp	5,289
S.00258	53901011	Electric Hydro Generation Operations	253,314
S.00258	53501005	Electric Hydro Generation Operations	67
S.00258	53900100	Electric Hydro Generation Operations	6,682
S.00260	54900100	Electric Other Generation Operations	776
S.00270	546000200	Electric Generation Operations	4,057
S.00270	53501020	Electric Generation Operations	525,643
S.00270	539000901	Electric Generation Operations	15,356
S.00270	546000201	Electric Generation Operations	65
S.00283	546000140	Electric Other Generation Operations	(76,618)
S.00283	54958010	Electric Other Generation Operations	140,024
S.00283	54958011	Electric Other Generation Operations	170,320
S.00284	55458010	Electric Other Generation Maintenance	72,515
S.00284	554002020	Electric Other Generation Maintenance	33,561
S.00284	554002345	Electric Other Generation Maintenance	5,019
S.00294	54601000	Electric Other Generation Operations	34,283
S.00303.01	53501003	ENERGY CONTROL SYSTEMS O&M	44,330
S.00305	50603002	5300 - Other Energy Expense	683
S.00502	55400080	Facilities-Other Generation Maintenance	4,657
S.00795	53901020	EIT PROGRAM - Generation O&M	8,949
S.00830	53901100	DAM SAFETY PLANS EXPENSE	12,188
S.00835	53501100	Energy Resource Compliance Hydro O&M	120,173
S.00835	53530012	Energy Resource Compliance Hydro O&M	19,016
S.00835	53530013	Energy Resource Compliance Hydro O&M	93,624
S.00835	53531013	Energy Resource Compliance Hydro O&M	342
S.00835	53532011	Energy Resource Compliance Hydro O&M	1,074
S.00835	53534011	Energy Resource Compliance Hydro O&M	3,216
S.00836	54601110	Energy Resource Compliance Thermal O&M	129,060
S.00836	54601120	Energy Resource Compliance Thermal O&M	93,624
S.00836	54653007	Energy Resource Compliance Thermal O&M	19,085
S.00836	54654008	Energy Resource Compliance Thermal O&M	9,942
S.00836	54655009	Energy Resource Compliance Thermal O&M	80,028
S.00836	54656005	Energy Resource Compliance Thermal O&M	69,088
S.00836	54662005	Energy Resource Compliance Thermal O&M	20,462
S.00836	546000000	Energy Resource Compliance Thermal O&M	1,828
S.00836	546000001	Energy Resource Compliance Thermal O&M	63,012
S.00836	546000100	Energy Resource Compliance Thermal O&M	100,441
S.00889	54904010	DIRECTOR THERMAL RESOURCES Other Exp	-
S.00889	549000740	DIRECTOR THERMAL RESOURCES Other Exp	6,946
S.01036	53501030	Hydro gen. station operation - S&E	75,988
S.01037	54601020	Other gen. station operation - S&E	252,754
S.01080	55000001	PSEE Gas Storage @ JP Rental Fee	1,130,625
			$ 4,502,816