

**BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION
COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET NO. UE-230313

DECLARATION OF
ROBERT L. EARLE

APPENDIX C

**PUGET SOUND ENERGY RESPONSE TO PUBLIC COUNSEL'S INFORMAL
DISCOVERY REQUEST NO. 7(C) POWEREX WINTER**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-230313
Puget Sound Energy
2022 Power Cost Adjustment Mechanism Report**

PUBLIC COUNSEL INFORMAL DATA REQUEST NO. 007

“CONFIDENTIAL” Table of Contents

	“CONFIDENTIAL” Material
Data Request No. 007	Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy’s Response to Public Counsel Informal Data Request No. 007 and Attachments A, B, C, and D thereto.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-230313
Puget Sound Energy
2022 Power Cost Adjustment Mechanism Report**

PUBLIC COUNSEL INFORMAL DATA REQUEST NO. 007:
REQUESTED BY: Robert Earle

SHADED INFORMATION IS DESIGNATED AS
CONFIDENTIAL PER WAC 480-07-160

Re: Powerex Winter Peak PPAs.

- a. Please answer yes or no. For the Power Winter Peak PPA referenced in Haines, Exh. PAH-3C, did PSE contact any other suppliers to meet its needs, or did PSE rely solely on Powerex?
- b. If the answer to subpart a. is yes, please provide a list of suppliers contacted and their responses to PSE's inquiries.
- c. If the answer to subpart a. is no, please explain why no other suppliers were contacted.
- d. Please answer yes or no. For the Power Winter Peak PPA referenced in Haines, Exh. PAH-4C, did PSE contact any other suppliers to meet its needs, or did PSE rely solely on Powerex?
- e. If the answer to subpart d. is yes, please provide a list of suppliers contacted and their responses to PSE's inquiries.
- f. If the answer to subpart d. is no, please explain why no other suppliers were contacted.
- g. Philip A. Haines, Exh. PAH-5C.
 1. Please provide workpapers in Excel format to support Haines, Exh. PAH-5C.
 2. Haines, Exh. PAH-5C, at 1. Please provide evidence including supporting documentation that "PSE is [REDACTED] MW in both the 2022/23/ and 2023/24 winter seasons.
 3. Haines, Exh. PAH-5C, at 1. Please provide calculation in Excel format resulting in the price of \$ [REDACTED] /MWh.
 4. Haines, Exh. PAH-5C, at 1. Please provide evidence for the [REDACTED] with supporting documentation including calculations and data in Excel.
 5. Haines, Exh. PAH-5C, at 1. Please provide in Excel format, the [REDACTED]
 6. Haines, Exh. PAH-5C, at 1. Please provide documentation of the [REDACTED]
 7. Haines, Exh. PAH-5C, at 1. Please provide evidence for the [REDACTED] with supporting documentation including calculations and data in Excel.

8. Haines, Exh. PAH-5C, at 2 & Exh. PAH-5C, at 1. Please provide evidence for the [REDACTED] with supporting documentation including calculations and data in Excel.
 9. Haines, Exh. PAH-5C, at 2 & Exh. PAH-5C, at 2. Please provide evidence for the Qualified Capacity component with supporting documentation including calculations and data in Excel.
 10. Does [REDACTED] refer to [REDACTED]
 11. Haines, Exh. PAH-5C, at 2 & Exh. PAH-5C, at 2. Please provide evidence for the [REDACTED] with supporting documentation including calculations and data in Excel.
- h. Philip A. Haines, Exh. PAH-6C.
1. Please provide workpapers in Excel format for Haines, Exh. PAH-6C.
 2. Please explain what is meant by GFG capacity in Haines, Exh. PAH-6C, at 2.
 3. Please provide the table on Haines, Exh. PAH-6C, at 3 in Excel format.
 4. Please provide the numbers underlying the graph on Haines, Exh. PAH-6C, at 4 in Excel format.
 5. Please provide the numbers underlying the graph on Haines, Exh. PAH-6C, at 5 in Excel format.
 6. Please provide the table on Haines, Exh. PAH-6C, at 6 in Excel format.
 7. Please provide the numbers underlying the graph on Haines, Exh. PAH-6C, at 7 in Excel format.
 8. Please provide the table on Haines, Exh. PAH-6C, at 11 in Excel format.
 9. Please provide the numbers underlying the graph on Haines, Exh. PAH-6C, at 12 in Excel format.
 12. Please provide supporting documentation and analyses including workpapers and data in Excel format for PSE's bids on the Powerex Winter Peak PPAs.
- i. Please provide copies of all the presentations to PSE's Board of Directors and Energy Management Committee concerning the Powerex Winter PPAs.

Response:

- a. No. Puget Sound Energy ("PSE") did not contact other suppliers to meet PSE's identified near term capacity need. To be clear, PSE did not contact Powerex either – PSE received the request for proposal ("RFP") from Powerex and the product offered in that RFP aligned with PSE's need for winter capacity.

- b. Not applicable.
- c. PSE did not contact any other suppliers. The Powerex Winter Peak PPA was a part of an opportunistic acquisition in response to an offer received outside of PSE's normal long-term RFP process. PSE pursues opportunities identified outside of its normal long-term resource procurement process when the opportunities align with PSE's resource needs and provide economic benefits to customers.
- d. Please see PSE's Response to Public Counsel Informal Data Request No. 007(a) and (c), above.
- e. Not applicable.
- f. Please see PSE's Response to Public Counsel Informal Data Request No. 007(a) and (c), above.
- g. See below:
1. Please see Please see PSE's Response to Public Counsel Informal Data Request No. 007(g2) through (g11), below.
 2. Attached as Attachment A to PSE's Response to Public Counsel Informal Data Request No. 007 please find an Excel workbook containing details and calculations supporting the information summarized in Haines, Exh. PAH-5C. The tab named "Capacity position (C)" includes PSE's winter 2022/2023 and 2023/2024 capacity requirements.
 3. Please see the tab named "Bid (C)" in Attachment A to this response.
 4. Please see the tab named [REDACTED] in Attachment A to this response.
 5. Please see the row labeled [REDACTED] (Excel row 8) on the tab named "Bid (C)" in Attachment A to this response.
 6. Please see the tabs named [REDACTED] and [REDACTED] in Attachment A to this response.
 7. Please see the tab named [REDACTED] in Attachment A to this response.
 8. Please see the tab named [REDACTED] in Attachment A to this response as well as the information presented in Exh. PAH-5C.

9. Please see the tab named [REDACTED] in Attachment A to this response.

10. As referenced in Exh. PAH-5C the term [REDACTED]

11. Please see the tab named "Bid (C)" in Attachment A to this response for data pertaining to the [REDACTED] This component of PSE's bid price reflects [REDACTED] associated with the [REDACTED]

h. See below:

1. Please see PSE's Response to Public Counsel Informal Data Request No. 007(h2) through (h9), below.
2. The term "GFG Capacity" refers to the capacity or generation potential of PSE's Gas-Fired-Generation assets.
3. The table in Exh. PAH-6C on page 3 did not rely on any underlying Excel-based calculations.
4. Attached as Attachment B to PSE's Response to Public Counsel Informal Data Request No. 007, please find the underlying data included in Exh. PAH-6C, at 4 in Excel format.
5. Attached as Attachment C to PSE's Response to Public Counsel Data Request No. 007, please find the underlying data included in Exh. PAH-6C, at 5 in Excel format.
6. Attached as Attachment D to PSE's Response to Public Counsel Data Request No. 007, please find the underlying data and calculations used in Exh. PAH-6C, at 6 in Excel format.

7. Please see Attachment D to PSE's Response to Public Counsel Data Request No. 007, for the underlying data and calculations used in Exh. PAH-6C, at 7 in Excel format.
 8. Please see Attachment D to PSE's Response to Public Counsel Data Request No. 007, for the underlying data and calculations used in Exh. PAH-6C, at 11 in Excel format.
 9. Attached as Attachment E to PSE's Response to Public Counsel Data Request No. 007, please find the data underlying the chart in Exh. PAH-6C, at 12 in Excel format.
12. Please see responses to parts g.1 through g.11 above.
- i. PSE did not present materials related to the Powerex Winter Peak PPA to its Energy Management Committee ("EMC") after the November 24, 2021 EMC meeting.

Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy's Response to Public Counsel Informal Data Request No. 007 and Attachments A, B, C, and D thereto.

**ATTACHMENTS A – E
to PSE’s Response to
Public Counsel Informal Data Request
No. 007**