BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, | DOCKET NO. UE-230313 |
|---|-----------------------------------|
| Complainant, | DECLARATION OF ROBERT L. EARLE |
| v. | |
| PUGET SOUND ENERGY | |

Respondent.

APPENDIX E

PUGET SOUND ENERGY RESPONSE TO WUTC STAFF INFORMAL DISCOVERY REQUEST NO. 012(C) POWEREX WINTER

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

WUTC STAFF INFORMAL DATA REQUEST NO. 012

"CONFIDENTIAL" Table of Contents

| | "CONFIDENTIAL" Material |
|-------------------------|---|
| Data Request No. 012 | Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy's Response to WUTC Staff Informal Data Request No. 012. |

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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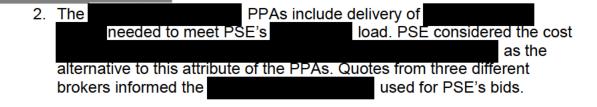
| WUTC STAFF INFORMAL DATA REQUEST NO. 012: REQUESTED BY: Crystal Oliver | SHADED INFORMATION IS DESIGNATED AS CONFIDENTIAL PER WAC 480-07-160 |
|--|--|
| Re: Contemporaneous Documentation for | |
| Haines, Exh. PAH-1CT, page 12 lines 11-12, states "The contemdocumentation provided with this testimony and exhibits demons considered and applied the Commission's prudency factors, including the consideration of alternatives." | trates that PSE |
| a. Haines Exh. PAH 5-C includes a memo explaining that PS describes the key terms of the any alternatives. What alternatives were considered? b. Haines Exh PAH 6C includes a Market Reliance Risk Mitig describing in its background an "absence of a comprehent adequacy planning standard", showing the "Benefits of Prograph showing including "Indicative Product Terms for including "Indicati | gation EMC Decisional resource oposed Solution" with a or mpact to Why |
| Response: | |
| a. As described in Exh. PAH-1CT, Puget Sound Energy ("PS alternative products that collectively could have met PSE portfolio benefits similar to those offered by the The cost of these alternative products directly informed the to the request for proposals. Exhibit PAH-5C des PSE considered to each attribute of the power purchase a Specifically: | products. e bids PSE submitted scribes the alternatives |
| 1. The PPAs provide the time PSE development of the PPAs. | eloped its bids as the |

PSE's Response to WUTC Staff Informal Data Request No. 012

Date of Response: July 11, 2023

Person who Prepared the Response: Brennan D. Mueller Witness Knowledgeable About the Response: Phillip H. Haines

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- 3. The PPAs provide energy that is
 As alternatives to this attribute of the PPAs, PSE considered the price paid in two previously executed contracts (the Powerex Summer Peak PPA and the Chelan Power Sales Agreement) as well as an avoided cost based on the price
- 4. The PPAs provide that can be that can be alternatives to this attribute of the PPAs PSE considered two previously executed contracts with similar attributes (the PPA and the pased on the cost of another pased on the cost of an another pased on the cost of another pased on the cost of an another pased on the cost of another pased o
- b. According to the presentation and recommendation presented to PSE's Energy Management Committee ("EMC") and included as Exh. PAH-6C the EMC authorized procurement of 500 MW of summer and winter capacity to meet PSE's near term capacity need and reduce reliance on market purchases. The presentation emphasizes summer capacity needs and uses examples from summer months because PSE did not previously consider summer capacity in its resource adequacy planning. Note that the charts and tables on pages 4, 6, and 7 of Exh. PAH-6C present portfolio positions and modeled impacts for all 12 months of the year.

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