

**Exh. JDW-9C  
UE-240004/UG-240005/UE-230810  
Witness: John D. Wilson  
REDACTED VERSION**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**DOCKETS UE-240004, UG-240005,  
UE-230810 (*Consolidated*)**

**EXHIBIT TO TESTIMONY OF**

**JOHN D. WILSON**

**ON BEHALF OF STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE's Response to Staff DR No. 216*

**August 6, 2024**

**CONFIDENTIAL PER PROTECTIVE ORDER – REDACTED VERSION**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-240004 & UG-240005  
Puget Sound Energy  
2024 General Rate Case**

**WUTC STAFF DATA REQUEST NO. 216**

**“CONFIDENTIAL” Table of Contents**

	<b>“CONFIDENTIAL” Material</b>
<b>Data Request No. 216</b>	Shaded information in Attachment A to PSE’s Response to WUTC Staff Data Request No. 216 is designated as CONFIDENTIAL per Protective Order in Dockets UE-240004 and UG-240005.

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-240004 & UG-240005  
Puget Sound Energy  
2024 General Rate Case**

**WUTC STAFF DATA REQUEST NO. 216:**

REQUESTED BY: John Wilson

**RE: Power Costs**

Regarding PSE Petition, Docket UE-220797:

- a. Please confirm that PSE has not updated its internal forecast of annual resource supply or CCA CO2 Emissions as shown in Tables 3 and 4 of the referenced filing.
- b. If not confirmed, please provide the update.
- c. Please provide a comparison between PSE's most recent forecast (either Table 1 of the referenced filing or the update provided in response to part (b)) and the equivalent data filed in this proceeding.
- d. If the comparison provided in part (c) indicates a significant difference, please (i) explain whether PSE plans to file a (further) update to its supply and demand forecast pursuant to RCW 70A.65.120 and (ii) provide an estimated date for such a filing or an explanation as to why no such filing is currently anticipated.

**Response:**

- a. Puget Sound Energy ("PSE") has not formally updated its four-year demand and resource supply forecast to determine the cost-burden effect and the allocation of no-cost allowances for approval by the Washington Utilities and Transportation Commission (the "Commission") and use by the Washington Department of Ecology in allocating no-cost allowances since the Commission issued Order 02 in Docket UE-220797.<sup>1</sup> Order 01 in Docket UE-220797<sup>2</sup> required PSE to notify "the Commission if there are any substantive changes, as that term may be

---

<sup>1</sup> See *In the Matter of the Petition of Puget Sound Energy for an Order Approving Forecasts Pursuant to RCW 70A.65.120*, Docket UE-220797, Order 02 (Approving Petition and Revised Forecast Subject to Condition) (July 27, 2023).

<sup>2</sup> See *In the Matter of the Petition of Puget Sound Energy for an Order Approving Forecasts Pursuant to RCW 70A.65.120*, Docket UE-220797, Order 01 (Approving Supply and Demand Forecast) (Jan. 24, 2023).

defined by the Commission in a subsequent proceeding,”<sup>3</sup> and Order 02 required PSE to file any revised forecast reflecting any substantive change by April 30, 2024.<sup>4</sup>

However, PSE does produce demand and resource supply forecasts as PSE acquires new resources or develops new or revised demand forecasts. Please see the Sixth Exhibit to the Prefiled Direct Testimony of Brennan D. Mueller, Exh. BDM-7C, at rows 91 through 168, for PSE’s most recent demand and resource supply forecast for calendar years 2025 and 2026.

- b. Not applicable.
- c. Attached as Attachment A to PSE’s Response to WUTC Staff Data Request No. 216 please find a comparison of the resource supply and demand forecast and associated emissions approved by the Commission in Docket UE-220797 to the equivalent forecast included in this proceeding. Estimated emissions in this proceeding are approximately seven percent lower than those approved in Order 02 in Docket UE-220797 for calendar year 2025, and estimated emissions in this proceeding are approximately one percent higher than those approved in Order 02 in Docket UE-220797 for calendar year 2026.
- d. At this time, PSE does not plan to file a revised four-year demand and resource supply forecast pursuant to RCW 70A.65.120. Although the Commission has not defined the term “substantive change” in a subsequent proceeding (as Order 01 in Docket UE-220797 indicated that it may so do), PSE considered the differences that existed in the spring of 2024 and reflected in subpart c. above as unlikely to meet the threshold established by the Commission and that any revision in calendar year 2024 was unnecessary. Should future forecasts of supply, demand, and resulting emissions result in a “substantive change” from those approved by the Commission in Order 02 in Docket UE-220797, then PSE would seek to update its four-year demand and resource supply forecast pursuant to RCW 70A.65.120 and in accordance with the Commission’s orders in Docket UE-220797.

Shaded information in Attachment A to PSE’s Response to WUTC Staff Data Request No. 216 is designated as CONFIDENTIAL per Protective Order in Dockets UE-240004 and UG-240005.

---

<sup>3</sup> Order 01 at ¶ 10.

<sup>4</sup> Order 02 at ¶ 16.

# **ATTACHMENT A to PSE's Response to WUTC Staff Data Request No. 216**