

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	
)	DOCKET NOS. UE-170002/UG-170003
WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION)	COMMENTS OF THE ALLIANCE OF
)	WESTERN ENERGY CONSUMERS
Rulemaking to Address Electric and Natural)	ON GAS COST OF SERVICE
Gas Cost of Service.)	TEMPLATE
_____)	

I. INTRODUCTION

Pursuant to the Washington Utilities and Transportation Commission’s (“Commission”) October 11, 2019 Notice of Opportunity to File Written Comments (“Notice”) in the above-referenced dockets, the Alliance of Western Energy Consumers (“AWEC”) files these comments on the Gas Cost of Service Template (“GCOST”).

II. COMMENTS

The Commission is requesting written comments from interested parties on the templates that were filed in these dockets on August 30, 2019. These comments focus on the GCOST.

AWEC believes that the GCOST will be a useful reference for parties to quickly find the summary of the results of cost of service studies. As AWEC indicated in its previous comments, however, the GCOST should be used only for a summary presentation of the underlying detailed modeling and work papers. The use of the GCOST should not replace the review and analysis of complete cost of service studies that are executable with all formulas intact for all parties to review.

Throughout this proceeding, AWEC has advocated for the use of Design Day Demand or Average and Excess methods for allocating the cost of mains in a utility’s gas class cost of service study because these methods best reflect class cost causation. AWEC has also proposed a compromise where three class cost of service studies are performed for determining a range of reasonableness for class cost of service: Design Day Demand, Average and Excess, and Peak and Average. It is AWEC’s opinion that performing three class cost of service studies is not a burden to the utility. To the extent multiple class cost of service studies are submitted by a utility in a gas rate case, a GCOST should be filed for each class cost of service study. This should not be a burden to the utility and will provide a convenient summary of each study that will be useful to the Commission and all parties in their review of a utility’s requested rate increase and rate spread.

AWEC appreciates the opportunity to file these comments.

DATED this 6th day of December, 2019.

Respectfully submitted,

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