

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

**PSE GRC 2009  
DOCKET NOS. UE-090704 and UG-090705**

**Public Counsel REVISED Response to Bench Request No. 1 (1/8/10)**

**Bench Request No. 1:** Please re-file the following exhibits along with the electronic worksheets supporting all calculations contained therein:

(JRD-2C) pages 1 – 41

(JRD-3C) pages 1 – 21

Please ensure that the re-filed exhibits include electronic versions of all spreadsheets with figures that link to the underlying formulas, not simply to calculated values. These re-submitted file(s) must be in Excel format and include all linked files with all formulas and formatting in every spreadsheet intact (formulas not converted to values or otherwise modified from original).

**RESPONSE (Original response 12/11/09):**

Two spreadsheets entitled “Re-file of JRD-2 on 12.11.09 per Bench Request 1.xls” and “Re-file of JRD-3C on 12.11.09 per Bench Request 1.xls” are attached responsive to the request. In order to provide all worksheets containing links to formulas, we have also included electronically the following original workpapers of Mr. Dittmer: “Aircraft Cost Adjustment.xls,” Public Counsel Property Insurance Adjustment.xls,” and “Public Counsel PSE Wage Adjustment.xls.” In preparing this request Public Counsel has followed the format employed in Staff’s revenue requirement accounting schedules, for efficiency as well as for consistency in presentation. All adjustments retain the original numbering that PSE initially employed, except for a limited number of incremental adjustments sponsored by the Public Counsel for which there was no comparable PSE-proposed adjustment. Please note that while original exhibit JRD-2C contained confidential information, the re-filed version included in response to this bench request, labeled “Re-file of JRD-2 on 12.11.09 per Bench Request 1.xls” does not contain confidential information.

Each adjustment schedule has a designation of “**CONTESTED**” or “**UNCONTESTED**” included in its heading to indicate whether the adjustment differs from that initially filed by PSE.

Most incremental changes to a PSE-original adjustment have been included within the attached Excel files: “Re-file of JRD-2 on 12.11.09 per Bench Request 1.xls” and “Re-file of JRD-3C on 12.11.09 per Bench Request 1.xls.” However, as noted above, where

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applicable, supporting spreadsheets are also being provided. The supporting spreadsheets provided in this response are unchanged from the comparable spreadsheets provided with Public Counsel's original testimony filing.

Finally, each file contains a reconciliation of PSE-proposed and Public Counsel-proposed adjustments.

For each schedule designated as "**CONTESTED**" we have identified the schedule included within original Public Counsel Exhibit No. JRD-2C or JRD-3C which reflect the adjustment which is causing the change to the "**CONTESTED**" PSE-designated schedule. The specific inputs to the adjustment which cause the change are highlighted in italics. The first sheet of each spreadsheet also includes an index that cross-references PSE numbered adjustments with Public Counsel numbered adjustments contained within Public Counsel Exhibit No. JRD-2C or JRD-3C.

This response is intended only to be a re-presentation, in the format required in Bench Request No. 1, of the revenue requirement positions in Public Counsel's original Exhibit Nos. JRD-2C and JRD -3C. Please also note, that in order to avoid confusion, this response does not contain any changes reflecting new information, corrections or other modifications.

However, Public Counsel anticipates that it will seek leave to file revised revenue requirement exhibits after the rebuttal filing deadline of December 17, 2009. This revision will address a limited number of errors identified during the preparation of this response,<sup>1</sup> corrections identified as part of the discovery process subsequent to the filing of Public Counsel's testimony, and any changes warranted by a review of filings made on December 17 by PSE or other parties.

**REVISED RESPONSE (1/8/10)**

This revised response is the revision anticipated and referenced in Public Counsel's initial December 11, 2009, response to Bench Request No. 1 (see above). Two spreadsheets entitled "Re-file JRD-2 per BR#1 REVISED 1.8.10.xls" per Bench Request 1.xls" and "Re-file JRD-3C per BR#1 REVISED 1.8.10.xls" are attached.

This revised response includes changes as follows: (1) corrections for errors in Public Counsel's revenue requirement presentation identified by Public Counsel witness James Dittmer, or by PSE; (2) corrections or changes made by PSE to its own

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<sup>1</sup> The schedules filed with this response note instances where an error has been identified to be corrected in the revised filing. As noted, there may be additional revisions after December 17.

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testimony/exhibits; (3) updates of certain adjustments presented within PSE's rebuttal filing which Public Counsel did not take exception to, and (4) concessions or agreements to Public Counsel, Staff, or other party positions made by PSE in rebuttal or in discovery responses.

The specific changes are listed as page 2 of the revised electric and gas schedules and are entitled "Changes Reflected in Public Counsel's (Electric/Gas) Revenue Requirement Schedules Filed Post PSE Rebuttal." In addition, on the schedule for each revised adjustment, the change or correction to the adjustment is described in bold letters at the bottom of the page. Finally, consistent with the original Bench Request response, whenever Public Counsel has an adjustment which differs from that of PSE (i.e., the "contested" adjustments), the input values of such adjustments which are different from those presented by PSE have been reflected in *italics*.

Public Counsel's Revised Response to Bench Request No. 1 supersedes original Exhibits JRD-2C and JRD-3C.