

EXH. BTC-4  
DOCKETS NOS. UE-240004/UG-240005  
2024 PSE GENERAL RATE CASE  
WITNESS: BRADLEY CEBULKO

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

DOCKET NOS. UE-240004 and UG-240005  
*(Consolidated)*

**EXHIBIT BTC-4 (NONCONFIDENTIAL) TO THE  
RESPONSE TESTIMONY OF**

**BRADLEY CEBULKO**

**ON BEHALF OF  
JOINT ENVIRONMENTAL ADVOCATES**

**August 6, 2024**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**JEA DATA REQUEST NO. 058:**

**Re: Decarbonization**

Please refer to PSE's 2023 updated Gas Decarbonization Study filed on December 22, 2023, in Docket UE-220066, slides 5 and 7.

- a) Please provide the underlying workpapers and data assumptions for these charts with all formulas intact.
- b) Please provide values or references to the following assumptions:
  - i. Costs per unit for "Equipment Costs"
  - ii. Costs per unit for "Conversion Costs"
- c) For each of the above, please explain if "Equipment Costs" and "Conversion Costs" represent one of the following:
  - i. the total cost of new electrification appliances;
  - ii. the incremental costs of electric equipment versus a baseline alternative (if so, please describe the baseline alternative and its costs); and
  - iii. another cost assumption (please describe).
- d) Please explain how the per unit cost assumptions were determined and whether they were informed by the results of the Cadmus analysis.
- e) Please provide any estimates in PSE's possession of the costs to PSE of providing any incentives or programs to achieve the level of electrification in each scenario.

**Response:**

Puget Sound Energy ("PSE") objects to JEA Data Request No. 058 to the extent it requests information that is publicly available or obtainable from some other source that is more convenient, less burdensome, or less expensive. Notwithstanding these objections, and subject thereto, PSE responds as follows:

- a) Please see Attachment A to PSE's Response to JEA Data Request No. 058 for workpapers for slide 5 from the Gas Decarbonization Study.

Please see Attachment B to PSE's Response to JEA Data Request No. 058 for workpapers for slide 7 from the Gas Decarbonization Study.

- b) Equipment costs and conversion costs are used interchangeably on the slide. The values for equipment costs can be found in Attachment A to PSE's Response to JEA Data Request No. 058.
- c) The equipment costs represent the full cost of the new electrification appliances.
- d) How the costs were determined is explained on slides 31 –35 of the study ([220066-Attachment A-PSE's Decarbonization Study.pdf](#)) and were derived by the Cadmus study.
- e) PSE determined the total cost per unit, as discussed in this data request, but did not estimate the cost to PSE for each scenario.

**ATTACHMENTS A – B to  
PSE's Response to  
JEA Data Request No. 058**