

EXH. BTC-14  
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-14 (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. 048:**

**Re: Decarbonization**

Please refer to Landers Direct, Exh. DJL-1Tr, 35, Table 7: Forecasted investments in customer and public safety, by category, 6 from January 1, 2025, through December 31, 2026, Gas Programs.

- a. Does the Gas Program “emergency repair” include just pipeline repair costs, or does it also include costs when PSE replaces a segment of pipe when there is an emergent need. If it includes both “repairs” and “replacements,” please provide a breakdown of the portion of the \$56.6 million that is forecasted to be “repairs” relative to “replacements.”
- b. For programmatic maintenance costs, does the Company consider pipeline repairs in lieu of replacement?

**Response:**

Puget Sound Energy (“PSE”) objects to JEA Data Request No. 048 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. The Gas Program “Emergency Repair” includes the capital costs for emergent work that is field identified. This body of work requires immediate repairs and does not go through the Integrity Management risk prioritization process. The types of projects include capital costs associated with leak repairs, cathodic protection, and meter replacements. The projects are 100% replacements; as this is a capital budget, all projects consist of replacing and/or retiring a unit of property. Please see the Second Exhibit to the Prefiled Direct Testimony of David J. Landers, Exh. DJL-3, page 4, line 12 to page 8, line 22 for a discussion on the “Emergency Repair” program.
- b. PSE’s Gas Operating Standard provides the framework for what is allowed for a given defect based on pipe material, operating pressure, defect type, extent of the damage, and whether the pipe has been structurally compromised. Engineering and field personnel evaluate and determine whether to perform a

replacement or an appropriate repair method in order to effectively and efficiently maintain the safety of the gas system.