

EXH. BTC-16
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-16 (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. 044:

Re: Decarbonization

Please refer to Mannetti Direct, Exh. JM-1CT 18 – 19, where the witness describes the Targeted Electrification of Natural Gas-Constrained Geographic Area Pilot.

- a. Please identify the costs of a traditional pipeline capital investment in the Duvall gas-constrained area if the Company was not pursuing the pilot.
- b. Please identify the timeline on which PSE needs to either make a capacity expansion investment or relieve demand through targeted electrification.

Response:

Puget Sound Energy (“PSE”) objects to JEA Data Request No. 044 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 pipeline solution for this project has a planning estimate of \$11 million dollars. It consists of constructing approximately 18,500 feet of new 8-inch pipeline in an area that is considered “difficult to very difficult” for construction due to wetlands and a potential water crossing. All planning level cost estimates have an assumed range of accuracy of +100% to -50%, which are refined during later stages of the project lifecycle as specific design and routing options are evaluated and selected.
- b. The project need was identified in 2018, and PSE currently relies on cold weather actions (“CWA”) described in the Prefiled Direct Testimony of David J. Landers, Exh. DJL-6 page 8, line 6 through page 9, line 1, to overcome inadequate pipeline capacity and maintain service to customers in this area. Specifically, PSE injects compressed natural gas (“CNG”) into the local pipeline system from mobile trailers, introducing risk to reliability and increasing operational costs associated with serving customers. For example, during the cold spell spanning 1/12/2024 – 1/15/2024, personnel were on-site 24 hours per day during CWA to manage equipment and pipeline pressure in the area.

While a capacity expansion need exists today, PSE believes reliable service can be maintained by CWA for an adequate period of time to conduct a targeted electrification pilot and evaluate the achieved load reduction. PSE needs at least 1,000 customers to electrify, assuming the number of existing customers and usage per customer remains at current levels, to avoid the required pipeline capacity expansion project. The desired timeline for this issue to be resolved is before the 2028-2029 winter season to minimize risk of outages and mitigate operational impacts from field workers being required to support the CNG injection.