

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-151871 UG-151872  
Puget Sound Energy's  
Electric and Natural Gas Equipment Lease Service**

**WUTC STAFF DATA REQUEST NO. 092**

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With regard to Exhibit No. LYN-1T 21:20-22, is PSE and its shareholders willing to bear the risk of over-recovery of all leasing costs? If not, why is PSE only willing to bear the burden of under-recovery? If so, how would PSE bear such risk if participating customer rates are fixed for the entire lease term?

**Response:**

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 092 as vague and ambiguous with respect to the phrase "bear the risk of over-recovery of all leasing costs." Without waiving these objections, and subject thereto, PSE responds as follows:

With regard to Exhibit No. \_\_\_\_ (LYN-1T) 21:20-22, PSE has established rates in a manner that PSE anticipates will result in the Company fully recovering all costs associated with providing the service along with its approved regulated rate of return and does not anticipate over- or under-recovery over the term of the lease. In response to the hypothetical situation presented above, PSE and its shareholders would "bear the risk of over-recovery" just as they bear the risk of under-recovery.