

**EXHIBIT NO. ___ (JAP-29)
DOCKET NOS. UE-111048/UG-111049
2011 PSE GENERAL RATE CASE
WITNESS: JON A. PILIARIS**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

**Docket No. UE-111048
Docket No. UG-111049**

**FIFTH EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED REBUTTAL TESTIMONY OF
JON A. PILIARIS
ON BEHALF OF PUGET SOUND ENERGY, INC.**

JANUARY 17, 2012

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED:	December 21, 2011	WITNESS:	Deborah J. Reynolds
DOCKETS:	UE-111048/UG-111049	RESPONDER:	Deborah J. Reynolds
REQUESTER:	Puget Sound Energy	TELEPHONE:	(360) 664-1255

PSE Data Request No. 023 to WUTC Staff:

RE: Deborah J. Reynolds, Exhibit No. ____ (DJR-1T), page 31, lines 10-11

Please provide a citation to the rule, order or law relied upon to support the claim on page 31, lines 10-11, of Exhibit No. ____ (DJR-1T).

RESPONSE:

PSE's estimates of energy savings are not rigorous enough for rate making because they are not known and measurable. The known and measurable standard is from WAC 480-07-510 (3)(e)(iii). Although this rule refers specifically to pro forma adjustments in general rate cases, the underlying principle is still fully applicable to analyzing the CSA.