

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.

Respondent.

DOCKETS UE-240004 & UG-240005 (*Consolidated*)

**ROBERT L. EARLE
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT RLE-4

PSE Response to Public Counsel Data Request No. 173 with Attachment

August 6, 2024

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Dockets UE-240004 & UG-240005
Puget Sound Energy
2024 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 173:**

RE: Direct Testimony of Ned W. Allis, Exh. NWA-1T at 31:14–15.

Please provide any calculations done with data in Excel format to support the expected 59 percent decline in the size of the gas system by 2050. In your answer, include calculations done by witness Allis as well as those done by PSE in the docket cited.

Response:

Puget Sound Energy (“PSE”) objects to Public Counsel Data Request No. 173 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:

Please refer to PSE’s Response to JEA Data Request No. 002. The 59 percent decline is shown in Attachment A to PSE’s Response to Public Counsel Data Request No. 173, which is the decline in residential, commercial, and industrial customers between 2024 and 2050 (from 882,960 therms to 360,020 therms).

The docket cited in the Prefiled Direct Testimony of Ned W. Allis, Exh. NWA-1T, at 31:14–15, footnote 8, refers to PSE’s decarbonization study completed in December 2023 for PSE’s Decarbonization Study Compliance Filing, Attachment A, Stipulation O in Dockets UE-220066 and UG-220067, et.al. Attached as Attachment A are the maximum volume of customers that would transition from gas to electric within Scenario 1 of the Stipulation O decarbonization study. This was based on equipment burnout over time as well as a customer’s willingness to adopt a heat pump. This analysis and corresponding load reductions were completed by Cadmus Group. The report associated with this analysis can be found as Attachment B at the following location: <https://apiproxy.utc.wa.gov/cases/GetDocument?docID=3616&year=2022&docketNumber=220066>

**ATTACHMENT A to PSE's Response
to Public Counsel Data Request No.
173 is Provided in Electronic Format
Only Due to its Voluminous Size
When Printed**