

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.

Respondent.

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

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

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**EXHIBIT RLE-5**

PSE Response to Public Counsel Data Request No. 178

**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. 178:**

RE: Direct Testimony of Ned W. Allis, Exh. NWA-1T at 20:19–21.

- a. Please provide support for the statement that “Gas mains and regulator stations would also be affected if gas throughput declines, as many of these facilities could become obsolete.”
- b. Does PSE assert that gas mains and regulator stations can be retired even if there is remaining flow on that part of the gas system? Please support your answer with any and all available documentation and studies to support your answer.
- c. Please provide estimates for each year from 2023 to 2050 the number of miles of gas mains and regulator stations that PSE will retire.
- d. Please provide the current miles of gas mains and regulator stations in PSE’s system.

**Response:**

Puget Sound Energy (“PSE”) objects to Public Counsel Data Request No. 178 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. PSE also objects to this request to the extent this request seeks a document that does not exist and is therefore not in the possession, custody, or control of PSE. Notwithstanding these objections, and subject thereto, PSE responds as follows:

- a. Page 20 of the Prefiled Direct Testimony of Ned W. Allis, Exh. NWA-1T, discusses the impacts of widespread electrification. With, for example, zonal electrification, mains and regulators that serve a particular area that electrifies would no longer be needed and would be retired along with services, meters and other affected assets.
- b. No. However, system changes could mean that regulator stations are no longer needed.
- c. Neither Mr. Allis nor PSE have made these estimates.
- d. PSE currently has 13,127.978 miles of gas mains and 581 regulator stations.