



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: September 7, 2022
DOCKETS: UE-220066/UG-220067/
UG-210918
REQUESTER: CENSE

WITNESS: Joel Nightingale
RESPONDER: Joel Nightingale
TELEPHONE: 360-664-1154

REQUEST NO. 1:

Exh JBN-1T at 8 discusses PSE's annual NERC-required transmission planning assessment (TPL) reports. Please provide a copy of each such PSE transmission planning assessment that you refer to. Include the entire document.

RESPONSE: The excerpts from the transmission planning assessment (TPL) reports referenced in Exhibit JBN-1T are contained in Exhibit JBN-2 filed to this consolidated docket. The entire document is attached to this data request response.

REQUEST NO. 2:

Regarding the PSE transmission planning assessment you provide under CENSE Data Request No. 001 to WUTC staff, please provide any audit of that transmission planning assessment that has been conducted by NERC or WECC.

RESPONSE: Staff does not possess any of the referenced audits of the transmission planning assessments that may have been conducted by NERC or WECC.

REQUEST NO. 3:

The Testimony of Joel B Nightingale finds that there should be no prudency review at this time and instead conduct a Prudency Review in the future. Regarding this statement:

- a) Please provide any problem you have found with the testimony of the CENSE expert Richard Lauckhart (RL-1T) that has been filed in this case. Please be specific with the page number and line number of that testimony that you find fault with.
- b) You indicate there can be rates can be subject to refund if a future Prudency Review finds that Energize Eastside was imprudent. Please explain how the safety issues and problematic environmental impacts will be remedied by your proposal and explain how justice is provided to CENSE members under your proposal.



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RESPONSE:

- A. Pursuant to WAC 480-07-400, UTC Staff objects to this data request as overbroad and unduly burdensome to the extent which it appears to be soliciting a comprehensive rebuttal to the responsive testimony of CENSE witness Richard Lauckhart.
- B. The UTC has jurisdiction to set regulated investor-owned utility rates that are fair, just, reasonable, and sufficient. The UTC does not issue or oversee any safety or environmental permits necessary to construct or maintain the Energize Eastside project. Even if the UTC did not allow the costs associated with the Energize Eastside project into electric rates provisionally, it would have no direct impact on the permits already granted to construct and maintain the project. Please refer to the responsive testimony of Joel Nightingale (Exhibit JBN-1T) for an explanation on why Staff believes that the costs associated with the Energize Eastside project should be provisionally included in electric rates, subject to refund.