

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKETS UE-220066, UG-220067, and UG-210918 (*Consolidated*)

**GLENN A. WATKINS
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT GAW-6

Puget Sound Energy Response to Federal Executive Agencies Data Request No. 13

July 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-220066 & UG-220067
Puget Sound Energy
2022 General Rate Case**

FEA DATA REQUEST NO. 013:

Re: COS (Cost of Service, Rate Spread, Rate Design)

Referring to the prefiled Direct Testimony of Company witness Birud Jhaveri, page 18, lines 13-19, please provide all data, calculations and work papers, in native format with all formulas intact, which support the statement that “the replacement of the previous peak credit method with the Company’s proposed method have an immaterial impact on the cost of service study results.”

Response:

Puget Sound Energy’s (“PSE”) proposed peak credit method was developed in accordance with General Order R-599 in Dockets UE-170002/UG-170003. The Commission established specific rules and filing requirements for cost of service studies under Chapter 480-85 WAC, including the usage of the Renewable Future Peak Credit (“RFPC”) method to classify generation related costs. As per the WAC rules, RFPC method must be applied to all generation expenses, except net power costs, which are classified and allocated using energy basis. The rules further require transmission expenses to be classified as 100% demand related.

Coincident with this data request response, PSE will be providing FEA with the work papers supporting this filing that were originally provided to parties on February 7, 2022, or as revised on March 18, 2022. Included in the work papers will be the electric cost of service model (*NEW-PSE-WP-BDJ-4-COS-Model-22GRC-01-2022.xls*) in native format, with all formulas and cell references intact.

The following table compares the parity ratios based on the RFPC and Fixed Peak Credit methods. As can be seen, the replacement of the previous peak credit method with PSE’s proposed method has an immaterial impact on the cost of service study results. Attached as Attachment A to PSE’s Response to FEA Data Request No. 013, please see the modified electric cost of service study model, which replaces the RFPC method with the Fixed Peak Credit method for all generation and transmission classification, in native format with all formulas intact.

	SCH 7	SCH 24	SCH 25	SCH 26	SCH 31	SCH 35	SCH 43	SCH SC	SCH 46&49	SCH 449 & 459	Street & Area Lighting	Firm Resale
Parity Ratio based on COS study results using RFPC method	0.99	1.05	0.99	0.98	0.99	0.60	1.06	0.65	1.15	1.24	1.00	1.00
Parity Ratio based on COS study results using Fixed Peak Credit method	0.99	1.05	0.99	0.97	0.99	0.59	1.01	0.65	1.13	0.97	0.98	0.99
Variance	0	0	0	(0.01)	0	(0.01)	(0.05)	0	(0.02)	(0.27)	(0.02)	(0.01)