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)

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

EXHIBIT RLE-13C

Puget Sound Energy Response to Public Counsel Data Request No. 352

July 28, 2022

Shaded Information is Designated Confidential Per Protective Order In
Dockets UE-220066, UG-220067, and UG-210918 (Consolidated)

REDACTED VERSION
BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

PUBLIC COUNSEL DATA REQUEST NO. 352

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

PUBLIC COUNSEL DATA REQUEST NO. 352:
REQUESTED BY: Robert Earle

Tacoma LNG

Re: Tacoma LNG—Project Execution Audit, February 2021; Puget Sound Energy Response to Public Counsel Data Request 205.

The referenced audit at page 4 states

a. Please provide workpapers that show the calculation of the [REDACTED VERSION]
b. Are the [REDACTED VERSION] based on the unregulated portions of the Tacoma LNG asset, the unregulated portion, or both the unregulated and regulated portion.
c. Please provide an updated calculation of the [REDACTED VERSION]

Response:

a. Puget Sound Energy ("PSE") objects to the request for work papers supporting the [REDACTED VERSION] of Puget LNG as it is requesting [REDACTED VERSION] information about an unregulated subsidiary of Puget Energy and the request is not relevant to this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. As such, PSE has not provided the requested information.

b. The [REDACTED VERSION] are based on both the regulated and unregulated portions of the plant.

c. Please see part a.

Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-220066 and UG-220067 as marked in the request and PSE’s Response to Public Counsel Data Request No. 352.