

**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-6

Puget Sound Energy Response to Public Counsel Data Request No. 311

July 28, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Dockets UE-220066 & UG-220067
Puget Sound Energy
2022 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 311:****Re: Tacoma LNG. Direct Testimony of Ronald J. Roberts, Exh. RJR-1CT at 108:10–109:10.**

Please provide a list of natural gas curtailments on Puget Sound Energy's system from 2012 to the date of this data request and provide supporting documentation. Please include the following items for each instance of curtailment:

- Date(s) and hours of curtailment.
- Core customer classes affected and amounts per class.
- Non-core customer classes affected and amounts per class.
- Which power generation facilities were affected, if any, and by what amount.

Response:

Puget Sound Energy ("PSE") provides the following table in response to Public Counsel Data Request No. 311, which contains curtailment events from 2012 through year-to-date 2022, including the number of customers curtailed by class for each date, hours of the curtailment period, and summation of therms estimated to be curtailed. A curtailment as defined by Gas Rule 23¹ can be called on customers that have interruptible sales or transportation service, which is interpreted as non-core or non-firm load although these customers may have some firm load that was not curtailed associated with their contract. The amounts of curtailed load is estimated for that period assuming the customer would have used its full load for the entire period as PSE does not have record of what a customer planned on using that day and period if a curtailment had not been called. The event starting on 10/10/2018 as a result of supply constraints associated with the Enbridge/West Coast natural gas line-break in Canada was an extended curtailment. During that event, customers were contacted and asked to curtail as soon as possible but start times were not recorded, thus as a result the estimation assumes curtailment occurred for the full 32 hours.

¹ https://www.pse.com/-/media/Project/PSE/Portal/Rate-documents/Gas/gas_rule_23.pdf

Curtailment Date	Hours of curtailment	Number of Commercial Customers	Total Estimated Curtailed Commercial Therms	Number of Industrial Customers	Total Estimated Curtailed Industrial Therms	Total
1/2/2013	4	-	-	1	5,000	5,000
1/12/2013	6	-	-	1	7,500	7,500
1/13/2013	6	-	-	1	7,500	7,500
1/14/2013	6	-	-	1	7,500	7,500
1/18/2013	6	-	-	2	10,800	10,800
11/22/2013	4	-	-	3	7,200	7,200
12/3/2013	6	-	-	3	10,800	10,800
12/4/2013	6	-	-	3	10,800	10,800
12/5/2013	6	-	-	4	43,800	43,800
12/6/2013	6	-	-	3	10,800	10,800
12/7/2013	6	-	-	3	10,800	10,800
12/8/2013	6	-	-	3	10,800	10,800
12/9/2013	6	-	-	3	10,800	10,800
2/3/2014	6	-	-	2	7,500	7,500
2/4/2014	6	-	-	3	10,800	10,800
2/6/2014	5	-	-	8	31,896	31,896
2/7/2014	6	-	-	4	28,800	28,800
12/7/2016	4	-	-	1	2,200	2,200
12/8/2016	4	-	-	1	2,200	2,200
12/14/2016	4	-	-	1	2,200	2,200
12/15/2016	4	-	-	1	2,200	2,200
12/16/2016	4	-	-	1	2,200	2,200
12/17/2016	4	-	-	1	2,200	2,200
1/3/2017	4	-	-	4	7,800	7,800
1/4/2017	4	-	-	1	2,200	2,200
1/6/2017	4	-	-	1	2,200	2,200
1/7/2017	4	-	-	1	2,200	2,200
1/11/2017	4	-	-	1	2,200	2,200
1/12/2017	4	-	-	2	3,800	3,800
1/13/2017	4	-	-	1	2,200	2,200
10/10/2018	32	345	1,304,090	74	1,663,296	2,967,386
12/27/2021	4	-	-	1	1,200	1,200
2/23/2022	4	-	-	1	1,200	1,200
Total	189	345	1,304,090	141	1,934,592	3,238,682

In addition to defined curtailments, PSE requested broad energy conservation through social media on 10/10/2018 as a result of supply constraints associated with the Enbridge/West Coast natural gas line-break in Canada that affected core customers in addition to the non-core customers already curtailed as shown above. The extent of the resulting curtailment of these core customer classes is not known as a result of this broad request to PSE customers.

None of PSE's electric generation facilities are connected to PSE's natural gas system.