

**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-11

Puget Sound Energy Response to Public Counsel Data Request No. 373

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. 373:

Tacoma LNG

Re: Tacoma LNG Project.

- a. Please answer yes or no. For the purpose of this question, define equity as “the benefits and burdens to Highly Impacted Communities and Vulnerable Populations.” Did Puget Sound Energy (PSE) consider equity or impacts on Named Communities in its decision-making or analyses of the Tacoma LNG Project?
- b. If the answer to sub-part a. is no, please explain why PSE did not consider equity or impacts on named communities in its decision making and analyses of the Tacoma LNG project.
- c. If the answer to sub-part a. is no, please explain why the Commission should not find the Tacoma LNG Project imprudent because PSE did not consider equity or impacts on named communities in its decision-making or analyses of the Tacoma LNG Project.
- d. If the answer to sub-part a. is yes, please provide an explanation of how PSE incorporated equity and impact on named communities into its analysis and decision making with respect to the Tacoma LNG project. Please include:
 - i. Documentation of how PSE incorporated equity and impact on named communities into its analysis and decision-making including any relevant presentation materials presented to the PSE Board of Directors or the Energy Management Committee.
 - ii. Documentation of how PSE incorporated equity and impact on named communities into its analysis and decision-making including models or workpapers that included equity as a consideration.

Response:

- a. No. At the time Puget Sound Energy (“PSE”) made the decision to construct the Tacoma LNG Project, it believed the facility would provide a safe and clean option for meeting its gas system peaking needs (see the Prefiled Direct Testimony of Ronald J. Roberts, Exh. RJR-1CT at 7-9, 17) and a clean transportation fuel for the

marine and trucking industries (see Exh. RJR-1CT at 17-18) - both of which would provide benefits to those living in the communities PSE serves and the greater Puget Sound Region. PSE continues to hold this belief.

- b. The phrase “Highly Impacted Communities and Vulnerable Populations” was first defined in 2021 with respect to energy law, long after the decision to construct the Tacoma LNG facility was made and construction of the Tacoma LNG facility was substantially complete. In addition, RCW 70A.02, which created obligations for various state agencies to incorporate environmental justice into the planning process and other processes, was enacted in 2021. Please also see subpart a of Puget Sound Energy’s (“PSE”) Response to Public Counsel Data Request No. 373.
- c. PSE objects Public Counsel Data Request No. 373 to the extent it calls for a legal conclusion. The Commission’s prudence standard considers what was known at the time of PSE’s decision to build the facility, which was 2016. The Prefiled Direct Testimony of Ronald J. Roberts, Exh. RJR-1CT at pages 7-9 provides further explanation of the prudence standard. Please also see subpart a of PSE’s Response to Public Counsel Data Request No. 373, and the Prefiled Direct Testimony of Ronald J. Roberts and supporting exhibits, for additional discussion about PSE’s decision regarding the Tacoma LNG Project.
- d. Not applicable.