

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 388****PUBLIC COUNSEL DATA REQUEST NO. 388:****Re: Direct Testimony of Katherine J. Barnard, Exhibit No. KJB-1T at 20-62
(Ratemaking Adjustments).**

Ms. Barnard explains a series of Adjustments that are common to both electric and gas operations that appear in Exhibit No. KJB-6 and then certain Electric-only Adjustments she sponsors in Exhibit No. KJB-7. Please respond to the following:

- a. Which of the adjustments 6.01 through 6.22 in Exhibit No. KJB-6 and 7.01 through 7.13 in Exhibit No. KJB-7 were not proposed by PSE in essentially the same form in the Company's previously filed electric rate cases?
- b. Which of the adjustments 6.01 through 6.22 in Exhibit No. KJB-6 and 7.01 through 7.13 in Exhibit No. KJB-7 are prepared in strict compliance with WAC 480-100-257?
- c. Which of the adjustments 6.01 through 6.22 in Exhibit No. KJB-6 and 7.01 through 7.13 in Exhibit No. KJB-7 are not prepared in strict compliance with WAC 480-100-257 because the adjustment purports to annualize price, wage, or other cost changes during a reporting period?
- d. Which of the adjustments 6.01 through 6.22 in Exhibit No. KJB-6 and 7.01 through 7.13 in Exhibit No. KJB-7 are not prepared in strict compliance with WAC 480-100-257 because the adjustment incorporates new theories or approaches that have not been previously addressed and resolved by the Commission?
- e. For each proposed ratemaking adjustment sponsored by Ms. Barnard that is not prepared in strict compliance with WAC 480-100-257, please explain why the adjustment is appropriate in the determination of the Company's asserted revenue requirement.
- f. For each proposed ratemaking adjustment sponsored by Ms. Barnard that is not prepared in strict compliance with WAC 480-100-257, please confirm that PSE would include that adjustment within its Commission Basis Reports prospectively, if the Company's proposed adjustment is affirmatively approved by the Commission, or explain any inability to provide such confirmation.

Response:

- a. Please see Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 151. PSE has not proposed changes in methodology to adjustments that have been included in prior cases. Attached as Attachment A to PSE's Response to Public Counsel Data Request No. 388 is an MS Excel file for electric, containing side by side comparisons of the standard adjustments performed in previous PSE general rate cases ("GRC"), and any unique or new adjustments specific to the case for the last three GRCs, including this proceeding, the 2011 GRC and the 2009 GRC.
- b. WAC 480-100-257 relates to the requirements associated with the Commission Basis Report ("CBR") required to be filed annually with the Commission¹, and does not have any bearing on GRC filings. PSE's filed case conforms to the requirements of WAC 480-07-510, which are the rules governing general rate proceedings for electric, natural gas, pipeline, and telecommunications companies. In general, since the GRC adjustments are governed by WAC 480-07-510 and the CBR adjustments are governed by WAC 480-100-257, it is the CBR adjustments that ultimately conform to the GRC adjustments currently in place and not the reverse.

Per WAC 480-100-257, CBR adjustments are done to depict normal electric and gas operations:

- adjusted for material out of period, nonoperating, nonrecurring and extraordinary items,
- under normal temperature and power supply conditions,
- without annualizing price, wage or other cost changes within the period,
- which exclude new theories or approaches not previously authorized by the Commission.

Attached as Attachment B to PSE's Response to Public Counsel Data Request No. 388 is a comparison of the electric adjustments in PSE's most recently approved GRC, which is its 2011 GRC, to the electric adjustments in PSE's December 2016 CBR, which contain the required adjustments that conform to the adjustments accepted in the 2011 GRC. The 2011 GRC adjustment numbering is taken from the rebuttal filing (closest to final) which uses a later numbering series from the original filing shown in Attachment A provided in subpart (a), but the numbering relationship is easily identified in the linked support to each attachment. Additionally, adjustments to this proceeding that are specific to (unique or new in) the case are listed beginning in row 35 of Attachment B.

¹ Note: PSE's rate plan approved by the Commission in Order 07 of UE-121697/UG-121705 required PSE to file an additional Commission Basis Report on a semi-annual basis during the rate plan period.

- c. See response to subpart (b).
- d. See response to subpart (b).
- e. See response to subpart (b).
- f. See response to subpart (b).