

# Bob Ferguson ATTORNEY GENERAL OF WASHINGTON

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August 14, 2024

Jeff Killip Executive Director and Secretary Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

RE: UTC v. Puget Sound Energy Dockets UE-240004, UG-240005, UE-230810 (consolidated)

Dear Mr. Killip:

Enclosed for filing in the above-referenced docket are Staff's Motion to File Revised Testimony, and redline and clean versions of the revised Testimony and Exhibits of Danny P. Kermode, Exhibit List, and Certificate of Service on behalf of Commission Staff. Five paper copies will be delivered to the Commission.

Below is a list detailing the revisions:

Exhibit	Change	Page or location references
DPK-1Tr	Updating exhibit references to reflect "r" for revised in exhibit number	Throughout document
	Update page numbering	Table of Contents
	Add "In Rate Year 1 the \$584.3 million is reduced by \$499.0 million by tariffs resetting to zero."	Page 3, lines 20-21
	Change "101" to "106.9" and add "in Rate Year 1 and \$25.3 million in Rate Year 2"	Page 3, lines 22-23
	Revise table	Page 4, lines 1-4
	Change reference to Exhibit DPK-4 to Exhibit DPK-5r	Page 5, line 16

## ATTORNEY GENERAL OF WASHINGTON

Jeff Killip August 14, 2024 Page 2

Replace "increases" with	Page 7, lines 2-4
"remains essentially the same	
since the costs do not change.	
The only difference being that,	
instead of those costs being	
collected in a tracker, the costs	
 are embedded in base rates."	
 Revise table	Page 7, between lines 6-7
Replace "110.4" with "110.5"	Page 7, line 8
and replace "257.0" with "275.5"	
Replace "1.57" with "1.83"	Page 8, line 2
 Replace "1.18" with "1.58"	Page 8, line 3
Replace "164.4" with "154.3"	Page 8, line 5
Replace "15.0" with "9.9"	Page 8, line 5
Revise table	Page 8, between lines 6-7
Delete ", resulting in a total	Page 9, lines 14-15
revenue requirement for Rate	
Year 1 of \$285.1 million, or a	
3.87 percent increase"	
 Replace "In" with "Also in"	Page 9, line 16
Replace "With costs" with	Page 9, lines 18-19
"Recognizing the resetting and	
the zeroing out of the five tariff	
schedules along with those	
 costs proposed"	
Delete ", resulting in a total	Page 9, line 20 through
revenue requirement of \$3,066	Page 10, line 2
million for Rate Year 2 or a	
7.26 percent increase, as shown on line 30"	
Insert "as mentioned before,"	Page 13, line 8
Replace "257.0" with "275.5"	Page 13, line 11
Revise table	Page 13, between lines 11
	and 12
 Replace "3.8" with "7.3"	Page 14, line 14
Replace "220.1" with "209.9"	Page 14, line 16
Replace "165.4" with "154.3"	Page 14, line 17-18
Replace "15.0" with "9.9"	Page 15, line 2
Replace "15.0" with "9.9"	Page 15, line 3
Revise table	Page 15, between lines 5
	and 6

## ATTORNEY GENERAL OF WASHINGTON

Jeff Killip August 14, 2024 Page 3

Insert "PSE's forecasted base	Page 16, line 12 through
rate gas sales revenues reflected	Page 17, line 2
in Adjustment 11.10"	
Delete "Revenues and Expenses	
and the impact on the gas rates"	
Replace "Mr." with "Witness"	
Delete "disputes", insert	
"disagrees with", insert "level	
of the", insert "forecasted",	
delete "proposed expected",	
insert "sale and resulting base	
rate revenues", delete	
"demanded by residential	
customers"	
Insert "Witness Watkins' Rate	
Year 1 revenue adjustment of	
\$27.634 million results in an	
incremental change in revenue	
from the Gap Year of a	
negative \$3.604 million instead	
of the Company's negative	
\$8.403 million incremental	
change in revenue. Similarly,	
Witness Walkins' Rate Year 2	
revenue adjustment of \$29.620	
million results in a negative	
\$0.487 million incremental	
change in revenue from Rate Year 1 instead of the	
Company's negative \$2.473	
million incremental change in	
revenues."	
Delete "He instead proposes a	
lesser decrease, resulting in in a	
projected decrease of revenues	
of \$3.6 million rather than the	
\$8.4 million offered by the	
Company for Rate Year 1. The	

#### ATTORNEY GENERAL OF WASHINGTON

Jeff Killip August 14, 2024 Page 4

	impact on revenues for Rate Year 2 drops to \$486,743."	
	Replace "329,037" with "345,453"	Page 17, line13
	Replace "438,000" with "459,798"	Page 17, line 14
	Replace "43.2" with "44.7"	Page 18, line 1-2
	Replace "89.4" with "48.4"	Page 18, line 2
	Replace "18.7" with "13.3"	Page 19, line 1
	Replace "18.5" with "21.7"	Page 19, line 2
DPK-3r	Revised calculation to reflect net revenue change of \$110,265,604 and \$275,464,785	See Page 1, line 30; Page 4; Page 5
DPK-4r	Revise calculation of operating income	Page 1-5
DPK-5r	Revised calculation to reflect net revenue change of \$110,265,604 and \$275,464,785	See Page 1, line 30; Page 4; Page 5
DPK-6r	Revise calculation of operating income	Page 1-5
DPK-7r	Revised calculation to reflect net revenue change of \$154,292,720 and \$9,911,064	See Page 1, line 22; Page 4; Page 5
DPK-8r	Revise calculation of operating income	Page 1-5

The enclosures are not to be construed as testimony or evidence until such time as they are received into the record at hearing. Accordingly, we reserve the right to make revisions or additions to them as may become necessary prior to the time that these witnesses present their testimony.

Sincerely,

/s/ *Lisa Gafken*, WSBA No. 31549 Assistant Attorney General (360) 464-6595 Lisa.Gafken@atg.wa.gov

LWG/jlr Enclosures cc: Parties w/enc.