

**Exh. BAE-9
Docket UG-230393
Witness: Betty A. Erdahl**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UG-230393

EXHIBIT TO TESTIMONY OF

BETTY A. ERDAHL

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to WUTC Staff DR No. 017

September 8, 2023

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UG-230393
Puget Sound Energy
Tacoma LNG Tracker**

**WUTC STAFF DATA REQUEST NO. 017:
DATA REQUESTS DIRECTED TO: Susan Free**

REQUESTED BY: Crystal Oliver

Re: Tacoma LNG Facility Capabilities and Use

Regarding Roberts's Testimony, Exh. RJR-1T, page 2 lines 13-17, "The project includes the Tacoma LNG Facility, which is capable of liquefying approximately 250,000 gallons of LNG per day and storing 8 million gallons of LNG on site. The Tacoma LNG Facility is capable of injecting 66,000 dekatherms per day ("Dth/day") of vaporized gas and diverting 19,000 Dth/day of gas into PSE's distribution system to provide 85,000 Dth/day of peak-day supply for customers."

- a. On what date did the facility begin liquefaction activities?
- b. Has the facility liquefied 250,000 gallons in a day?
- c. What is the most liquefied gas the facility has generated in a day?
- d. How much LNG has the facility liquefied to date?
- e. Has the facility stored 8 million gallons at once?
- f. How much LNG has the facility had stored on average since beginning liquefaction and storage activities?
- g. How much LNG has the facility stored to date?
- h. How much LNG has been delivered to TOTE to date?
- i. During the 2022 use of the facility for peak-shaving, how was the facility used to meet that need?
 1. Was LNG vaporized and injected into the PSE distribution system? If so, how much?
 - i. If LNG was vaporized how many hours was the vaporizer used for?
 2. Was vaporized gas diverted to the PSE distribution system? If so, how much?
 - i. If vaporized gas was diverted, how was gas quality improved prior to use?
 3. Was LNG transported via truck to the Gig Harbor storage facility? If so, how much LNG was transported?
 4. Please provide supporting contemporaneous documentation.

Response:

- a. Commissioning of the Tacoma LNG Facility occurred during December of 2021 and January of 2022. The Tacoma LNG Facility entered into commercial operations on February 1, 2022, and Puget Sound Energy ("PSE") considers February 1st as the official date on which the facility was commercially available for Liquefaction.
- b. Yes.
- c. 22,529 Dth (gross) / 257,507 gallons (gross).
- d. 2,305,249 Dth (gross) / 26,668,446 gallons (gross).
- e. No. Inventory build is occurring throughout the spring and fall of 2023 in preparation for the winter 2023-2024 winter peaking season.
- f. 214,869 Dth / 1,922,543 gallons.
NOTE: During the spring & summer of 2022, tank inventory was minimized to mitigate the delay in TOTE first bunkering. Levels were restored by October 2022 in preparation for PSE's 2022-23 peak-shaving season.
- g. Refer to d.
- h. PSE objects to WUTC Staff Data Request No. 017 as overbroad, beyond the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence because it seeks information regarding the unregulated activities of Puget LNG, LLC and its customers. Subject to and without waiving its objection, PSE states as follows: 1,126,192 Dth / 12,898,326 gallons of LNG have been delivered to Puget LNG from the Tacoma LNG Facility.
- i. PSE objects to WUTC Staff Data Request No. 017 to the extent it misstates and mischaracterizes testimony and is not calculated to lead to admissible evidence. Subject to and without waiving its objection, PSE states as follows:
 1. The Tacoma LNG Facility was used to meet PSE's peak-shaving and distribution needs commencing in January of 2023. *See* the Prefiled Direct Testimony of Ronald J. Roberts, Exh. RJR-1T at 40:3-9.
NOTE: During the month of March 2022, vaporization was utilized to reduce tank volume in correlation with TOTE's 6-month delay in first bunkering, however this was not considered peak shaving.
 2. The reference to "diverting 19,000 Dth" in the referenced testimony refers to natural gas that would otherwise be purchased by PSE and sold to Puget LNG (for liquefaction) but is instead retained in the PSE distribution system

and utilized at other city-gates ("diverted") for PSE gas customers. As such, it is not gas vaporized from LNG.

3. Yes. During 2022 up through June of 2023, 43,636 Dth / 508,931 gallons of LNG were delivered to Gig Harbor from the Tacoma LNG Facility.
4. Please see Attachment A to PSE's Response to WUTC Staff Data Request No. 019 for the Truck Log for the Tacoma LNG Facility.