PSE Response to WUTC Staff Data Request No. 091

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets UE-220066 & UG-220067 Puget Sound Energy 2022 General Rate Case

WUTC STAFF DATA REQUEST NO. 091:

REQUESTED BY: David Gomez

Re: Tacoma LNG

Referring to the Background Section, Table 2.6, explain Footnote a:

"Peak Shaving is to occur for no more than 10 years facility life. The analysis examines 60 days of peak shaving in the baseline case since peak shaving will occur during 25% of the facilities [sic] life. 240 hours of peak shaving are examined as a sensitivity."

If peak shaving is to only occur for 10 years, what year is the final year of peak shaving. Also explain why the *LNG Financial Model 20160919 (C)* workpaper assumes a 25-year depreciation schedule.

Response:

Attached as Attachment A to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 090 is the Background Section that was provided with this data request.

PSE objects to WUTC Staff Data Request No. 091 to the extent it relies on incorrect information in the "Background Section" and misstates information contained in the referenced footnote in the Background Section. The Final Supplemental Environmental Impact Statement was prepared by the Puget Sound Clean Air Agency and published by the agency in March 2019; it was not "submitted by PSE on March, 29, 2019," as the Background Section states.

PSE has never indicated that peak-shaving at Tacoma LNG Facility would only be utilized for 10 years. Peak-shaving is the primary purpose for which PSE, as a gas utility, had an interest in the Tacoma LNG Project. Both scenarios in the Final Supplemental Environmental Impact Statement (250,000 and 500,000 gallons per day) include onsite peak shaving for 240 hours per year for the facility's life (40 years).

Please refer to PSE's Response to WUTC Staff Data Request No. 039 for information regarding the depreciation schedule as included in the referenced work paper above.

PSE's Response to WUTC Staff Data Request No. 091

Date of Response: March 31, 2022

Person who Prepared the Response: Bill Donahue

Witness Knowledgeable About the Response: Ronald J. Roberts