

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-090704 and UG-090705
Puget Sound Energy, Inc.'s
2009 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 577

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Reference page 12 of Mr. Garratt's rebuttal testimony and the quantitative analysis results presented on Exhibit RG-3HC, page 119. Please indicate whether the referenced PPA bid was forecasted to produce higher system production cost benefits than the Mint Farm acquisition in all major scenarios evaluated by PSE.

Response:

Puget Sound Energy, Inc. ("PSE") does not deny that the purchased power agreement ("PPA") bid referenced on page 12 of the Prefiled Rebuttal Testimony of Roger Garratt, Exhibit No. 53HCT, was forecasted to have a higher portfolio benefit than Mint Farm. While page 119 of Exhibit No. RG-3HC documents that the PPA bid did have a higher portfolio benefit, it also documents that Mint Farm Energy Center had a lower levelized cost per megawatt hour and better scenario dispersion ranking than the referenced PPA bid.

On pages 9–28 of Exhibit No. 53HCT, Mr. Garratt discusses at length the extensive qualitative criteria and the three quantitative metrics PSE analyzes and considers before making any resource acquisition. It is improper to focus solely on one statistic to the exclusion of all other quantitative and qualitative factors.