EXHIBIT NO. \_\_\_\_\_ (AML-9)

DOCKET NOS. UE-170033/UG-170034

2017 PSE GENERAL RATE CASE

WITNESS: AMANDA M. LEVIN

BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

|  |  |
| --- | --- |
| WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,  Complainant,  v.  PUGET SOUND ENERGY,  Respondent. | DOCKETS UE-170033 and UG-170034 (Consolidated) |

EXHIBIT AML-9 TO PREFILED RESPONSE TESTIMONY

(NON-CONFIDENTIAL) OF AMANDA M. LEVIN

ON BEHALF OF NW ENERGY COALITION

JUNE 30, 2017

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-170033 and UG-170034**

**Puget Sound Energy**

**2017 General Rate Case**

**NWEC-RNW-NRDC** **DATA REQUEST NO. 050**

**NWEC-RNW-NRDC DATA REQUEST NO. 050:**

The intent of these discovery questions is to drill into data relating to the findings with respect to the treatment of resource costs and distribution capacity-related costs in calculations of the three block rate discussed by Mr. Piliaris at pages 57-60 of his direct testimony and calculated in Table 8 of that testimony. We are amenable to responses that meet this objective in a manner less burdensome to the Company.

Please re-run the Residential Tail Block Rate Calculations (Exhibit JAP-34T) to account for associated carbon emissions related to the long-run avoided cost of power and delivery using the high-CO2 price forecast from the Company’s 2015 IRP.

**Response:**

Puget Sound Energy (“PSE”) has not developed a forecast of power prices that (i) is otherwise consistent with the forecast used to develop the tail block rate calculations in the Prefiled Supplemental Direct Testimony of Jon A. Piliaris, Exh. JAP-34T, and (ii) uses the high-CO2 price forecast from PSE’s 2015 Integrated Resource Plan (“IRP”). PSE has only developed an updated forecast of power prices that assumes no price for CO2 and another that uses the mid-CO2 price forecast from its 2015 IRP. Therefore, the requested analysis related to the tail block calculation using the high-CO2 price forecast is unavailable.