

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-070725

**Amended Petition of Puget Sound Energy, Inc. For an Order Authorizing
the Use of the Proceeds from the Sale of RECs and CFIs**

PUBLIC COUNSEL DATA REQUEST NO. 010

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Does the "California Receivables" that PSE seeks to recover reflect the cost of energy sold by PSE to California utilities, or does it reflect the price charged by PSE for such energy?

Response:

The California Receivable reflects neither the cost of energy sold by Puget Sound Energy, Inc. ("PSE") to California utilities nor the price charged by PSE for such energy. The California Receivable is the discounted amount that PSE had a reasonable expectation that it would be able to collect from California, before interest, for its power sales into California if litigation ran its course. It is the amount that PSE had maintained on its books after an initial write-off of approximately \$36.5 million for actual power sales into California. Attached as Attachment A to PSE's Response to Public Counsel Data Request No. 010, please find a copy of PSE's Response to Public Counsel Data Request No. 507 in WUTC Docket No. UE-090704, *et al.*

Attachment A to PSE's Response to Public Counsel Data Request No. 010 is CONFIDENTIAL per Protective Order in WUTC Docket No. 070725.

ATTACHMENT A
TO PSE'S RESPONSE TO PUBLIC COUNSEL
DATA REQUEST NO. 010, PSE'S RESPONSE
TO PUBLIC COUNSEL DATA REQUEST NO.
507

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. 507

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Please indicate whether the approximate \$21 million "California Receivables" that PSE seeks to recover by retention of a portion of the California REC sales revenues represents the cost of energy sold by PSE to California utilities, the price charged by PSE for such energy or some other amount, and provide the actual volume (MWh) and cost incurred by PSE for the energy sold which underlies this claimed amount.

Response:

Attached as Attachment A to Puget Sound Energy, Inc.'s ("PSE") Response to Public Counsel Data Request No. 507, please find a copy of a certification of amounts due, as of April 10, 2009, from the California ISO. As shown in the certification, amounts reflected on the certification for receivable prior to January 2001 total \$58,675,911.

Attached as Attachment B to PSE's Response to Public Counsel Data Request No. 507, please find a California ISO/PX receivable summary as of June 30, 2009. The \$21.1 million California Receivable is the remaining revenue due from the California ISO after taking into consideration the write-offs and adjustments shown in Attachment B to PSE's Response to Public Counsel Data Request No. 507.

PSE recognized the costs associated with these sale transactions in expense at the time the original receivable was recognized. As PSE sells from a portfolio, specific resources used to support the sales are not identifiable. As a result, both the quantity information request and the request for cost information are not available. PSE's receivable from the California ISO equals \$57,568,519 (the \$21.1 million net receivable plus a \$36.5 million reserve). The receivable is reflected in cell E79 and the reserve is reflected in cell D18 of Attachment B to PSE's Response to Public Counsel Data Request No. 507. Accordingly, the California ISO has certified slightly more than PSE had originally recognized, the difference being attributable to PSE never having finished reconciling transactions which would have occurred at the time the claims were initiated in 2001.

Should Public Counsel want to view any underlying documentation supporting either Attachment A or B to PSE's Response to Public Counsel Data Request No. 507, Public Counsel may make an appointment to visit PSE's headquarters at a mutually agreeable time. Please notify PSE in enough time with the transactions of interest so that PSE may recover the necessary documentation from storage.

Attachments A and B to PSE's Response to Public Counsel Data Request No. 507 are CONFIDENTIAL per Protective Order in WUTC Docket Nos. UE-090704 / UG-090705.

**CONFIDENTIAL ATTACHMENT B TO PSE'S RESPONSE TO
PC DR NO. 507, IN DOCKET NO'S. UE-090704, UG-090705**

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