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March 7, 2012

Dennis Moss, Administrative Law Judge Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW P. O. Box 47250 Olympia, Washington 98504-7250

RE: Puget Sound Energy 2011 General Rate Case

Dockets UE-111048 and UG-111049 (Consolidated) UTC Staff Response to Bench Request No. 21

Dear ALJ Moss:

Enclosed are the original and 18 copies of Commission Staff's Response to the Commission's Bench Request No. 21.

If you have any questions, you may contact me at (360) 664-1188.

Sincerely,

ROBERT D. CEDARBAUM Assistant Attorney General

RDC:klg Enclosures

cc: Parties

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSE TO DATA REQUEST

DATE PREPARED:

March 7, 2012

WITNESS:

DOCKET:

UE-111048/UG-1110489

RESPONDER:

REQUESTER:

Bench

TELEPHONE:

BENCH REQUEST NO. 21B:

Do you propose to update power costs using the same methodology that PSE used in its supplemental testimony updating as-filed power costs in this proceeding?

1. If not, describe the methodology you propose to use, identify each component adjustment that contributes to the overall adjustment and explain why you believe the methodology is more appropriate than that PSE used in its supplemental filing.

RESPONSE:

Yes. Staff concurs with the Company's response to Bench Request 21A for purposes of this case.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSE TO DATA REQUEST

DATE PREPARED:

March 7, 2012

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UE-111048/UG-1110489

RESPONDER:

REQUESTER:

Bench

TELEPHONE:

BENCH REQUEST NO. 21C:

With respect to each underlying adjustment you propose to PSE's overall power costs, state whether it is an "in-AURORA" adjustment or an "outside-AURORA" adjustment.

RESPONSE:

The adjustments labeled A through G in Exhibit APB-2 are all "outside-AURORA" adjustments. Adjustment H and the Staff accepted adjustments for the "power cost update", also shown on Exhibit DEM-11CT, page 12, Table 3, lines 18-20, and page 13, Table 4, line 6, can be either or both "in-AURORA" or "outside-AURORA". For example, in the Company's rebuttal filing, the updated gas prices resulted in changes to "in-AURORA" power costs such as fuel and purchased power, and at the same time "outside-AURORA" Production O&M costs were updated.