

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UG-230393

**ROBERT L. EARLE
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT RLE-5

Puget Sound Energy Response to Public Counsel's Data Request No. 37

September 8, 2023

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UG-230393
Puget Sound Energy
Tacoma LNG Tracker**

PUBLIC COUNSEL DATA REQUEST NO. 037:

REQUESTED BY: Robert Earle

Re: PSE Response to Public Counsel Data Request No. 030, subpart b.

With respect to PSE's 2005 Least Cost Plan, Appendix I, please provide:

- a. Ref: Appendix I, at 1, fn.3. A copy of Washington Natural Gas's 1995 Least Cost Plan along with all appendices and workpapers.
- b. Ref: Appendix I, at 1, fn.3. A copy along with all appendices and workpapers of the market research referenced.
- c. Ref: Appendix I, at 3. Please provide in Excel format the calculations underlying Exhibit I-2.
- d. Ref: Appendix I, at 3. Please provide in Excel format the calculations underlying Exhibit I-3.
- e. Ref: Appendix I, at 4. Please provide in Excel format the calculations underlying Exhibit I-4.
- f. Ref: Appendix I, at 5. Please provide in Excel format the numbers underlying Exhibit I-5.
- g. Ref: Appendix I, at 5, Exhibit I-5. Please provide the daily peak day temperatures in Excel format from 1950 to 2003.
- h. Ref: Appendix I, at 5, Exhibit I-5. What is the data source for the daily peak day temperatures in Exhibit I-5?
- i. Ref: Appendix I, at 5, Exhibit I-5. What is the location for the temperature measured in the daily peak day temperatures in Exhibit I-5?

Response:

Puget Sound Energy ("PSE") objects to Public Counsel Data Request No. 037 as overbroad and unduly burdensome as it requests information outside the scope of this proceeding, information that is not easily accessible, and it is not reasonably calculated to lead to discoverable evidence. The information requested is at least 18 years old and not readily available, and the 2005 Plan was not mentioned in the testimony.

The issue of design peak day gas requirements was heavily litigated and resolved in the 2022 General Rate Case order:

Bearing this framework in mind, we agree that PSE has demonstrated a need for the Tacoma LNG Facility at least through the initial decision to build the facility on September 22, 2016. As PSE explains, the Commission has reviewed and accepted the approach PSE uses for its gas planning and IRP processes since at least 2005. IRP planning standards encourage a reliable, adequate gas service for core customers. PSE reasonably relied on its forecasts for gas demand, which showed a need for an LNG peak-shaving facility. Although Public Counsel and the Tribe challenge PSE's forecasting methods, we find these arguments unpersuasive. PSE observes that its forecasts for gas demand declined, and it reevaluated the need for an LNG facility in 2016 and 2018.

See Dockets UE-220066/UG-220067 and UG-210918 (consolidated), Final Order 24/10 ¶ 394 (Dec. 22, 2022).