## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

## PUBLIC COUNSEL DATA REQUEST NO. 023:

#### Re: Direct Testimony of Ronald J. Roberts, Exh. RJR-1T at 39:10–51:16.

- a. For each day, starting with the day the Tacoma LNG facility began operations, please provide in Excel format:
  - 1. The amount of natural gas received by the Tacoma LNG facility.
  - 2. The amount of natural gas liquified by the Tacoma LNG facility.
  - 3. The amount of liquified natural gas held at the Tacoma LNG facility.
  - 4. The amount of liquified natural gas held at the Tacoma LNG facility owned by Puget LNG.
  - 5. The amount of liquified natural gas held at the Tacoma LNG facility owned by PSE.
  - 6. The amount of liquified natural gas trucked to other facilities and which facilities received the liquified natural gas.
  - 7. The amount of liquified natural gas transferred to customers of Puget LNG.
  - 8. The amount of liquified natural gas transferred to regulated PSE customers.
  - 9. The amount of natural gas vaporized by the Tacoma LNG facility.
  - 10. The amount of natural gas injected into PSE's distribution system for the consumption of non-regulated PSE customers.
  - 11. The amount of natural gas injected into PSE's distribution system for the consumption of regulated PSE customers.
- b. For each day starting on January 1, 2017, through the date of this data request, for the Gig Harbor LNG facility, please provide in Excel format:
  - 1. The amount of natural gas (not liquified) in the Gig Harbor LNG facility.
  - 2. The amount of liquified natural gas at the Gig Harbor LNG facility.
  - 3. The amount of natural gas received at the Gig Harbor LNG facility from PSE's distribution system.
  - 4. The amount of liquified natural gas received by the Gig Harbor LNG facility and the source of that liquified natural gas.
  - 5. The amount of liquified natural gas vaporized at the Gig Harbor LNG facility.
  - 6. The amount of natural gas injected into PSE's distribution system.
  - 7. The amount of transfers of LNG to other facilities with identification of the amounts and which facilities received the LNG.

c. For each day starting on January 1, 2012, through the date of this data request, please provide the daily core gas demand, daily non-core gas demand, and total gas demand on PSE's distribution system.

## Response:

- a. Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 023, please find the following:
  - 1. The amount of natural gas received by the Tacoma LNG facility in Column C on monthly tabs (NOTE: For Feb-22 refer to Columns B & C).
  - 2. The amount of natural gas liquified by the Tacoma LNG facility in Column N on monthly tabs (NOTE: For Feb-22 refer to Column K).
  - 3. The amount of liquified natural gas held at the Tacoma LNG facility in Column Q on monthly tabs (NOTE: For Feb-22 & Mar-22 refer to Column N).
  - The amount of liquified natural gas held at the Tacoma LNG facility owned by Puget LNG in Column S on monthly tabs (NOTE: For Feb-22 & Mar-22 refer to Column P)
  - The amount of liquified natural gas held at the Tacoma LNG facility owned by PSE in Column R on monthly tabs (NOTE: For Feb-22 & Mar-22 refer to Column O).
  - 6. PSE objects to this request to the extent it seeks information beyond the scope of this proceeding, including information regarding customers of Puget LNG and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objection, PSE states as follows: The amount of liquified natural gas trucked to other facilities and which facilities received the liquified natural gas. For PSE truckloads refer to Attachment A Column H on monthly tabs (NOTE: For Feb-22 refer to Column F). All PSE truckloads were delivered to PSE's Gig Harbor Facility. For Puget LNG truckloads refer to Attachment A Column I on monthly tabs (NOTE: For Feb-22 & Mar-22 refer to Column G)..
  - 7. PSE objects to this request to the extent it seeks information beyond the scope of this proceeding, including information regarding customers of Puget LNG and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objection, PSE states as follows: The amount of liquefied natural gas transferred to customers of Puget LNG can be calculated by summing deliveries via Bunkering (Refer to Attachment A Column G) and deliveries via truck (Refer to Attachment A Column I)

- 8. PSE objects to this request as the phrase "regulated PSE customers" is vague and ambiguous. Subject to and without waiving its objection, PSE states as follows: The amount of liquefied natural gas transferred to customers of PSE's regulated natural gas utility system can be calculated by summing truck deliveries to PSE's Gig Harbor facility (Refer to Attachment A – Column H) and deliveries via regasification (Vaporization) (Refer to Attachment A – Column J)
- 9. For the amount of liquefied natural gas regasified (vaporized) back into PSE's gas system, refer to Attachment A Column J.
- 10. PSE objects to this request as the phrase "non-regulated PSE customers" is vague and ambiguous. Subject to and without waiving its objection, PSE states as follows: All gas injected into PSE's gas system serves the consumption needs of PSE natural gas customers.
- 11. PSE objects to this request as the phrase "regulated PSE customers" is vague and ambiguous. Subject to and without waiving its objection, PSE states as follows: All gas injected into PSE's gas system serves the consumption needs of PSE natural gas customers.
- Attached as Attachment B<sup>1</sup> to PSE's Response to Public Counsel Data Request No. 023, please find the following.
  - 1. All gas stored at the Gig Harbor LNG facility is in liquid form.
  - For the amount of liquified natural gas at the Gig Harbor LNG facility, please refer to Attachment B – *Gig Harbor Monthlies* tab. Inventory reporting is monthly based.
  - 3. Gig Harbor receives gas volumes via LNG truck delivery only.
  - For the amount of liquified natural gas received by the Gig Harbor LNG facility and the source of that liquified natural gas, please refer to Attachment B – LNG Plant Loads and LNG Loads tabs.
  - 5. For the amount of liquified natural gas vaporized at the Gig Harbor LNG facility, please refer to Attachment B *PLNG Plant Ops* tabs.
  - 6. For the amount of natural gas injected into PSE's distribution system, please refer to Attachment B *PLNG Plant Ops* tabs.

<sup>&</sup>lt;sup>1</sup> PSE removed employee names from Attachment B as nonresponsive or exempt information.

- 7. There were no transfers of LNG from Gig Harbor to other facilities.
- c. Attached as Attachment C to PSE's Response to Public Counsel Data Request No. 023, please find the daily core gas demand, daily non-core gas demand, and total gas demand on PSE's distribution system for each day starting on January 1, 2012 to current.

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# ATTACHMENT A TO PUGET SOUND ENERGY RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. 23 PROVIDED IN ELECTRONIC FORMAT ONLY DUE TO ITS VOLUMINOUS SIZE