

1. If Wild Horse was in the BPA balancing authority area, the BPA rate for hour ahead wind integration costs would be the VERBs rate.
2. The PCA Settlement allows for expedited rate proceedings, by which PSE can update its baseline rate either for new resources or changes in power costs.
3. Regarding my proposed adjustment of \$843,700 for BPA transmission credits, that adjustment is no longer necessary. I testified that PSE had only included nine months of the credit for LSR, but actually PSE had adjusted that in PSE's Response to WUTC Staff Data Request No. 195. Mr. Martin and Mr. Applegate both used the data response correctly in their exhibits thereby making my proposed adjustment unnecessary.
4. I used a five-year average of non-contract major maintenance expense from 2006-2010.
 - a. My five-year average includes \$0 for non-contract major maintenance for Sumas in 2006-2008; however, PSE did not acquire Sumas until July 2008.
 - b. My five-year average includes \$0 for non-contract major maintenance for Mint Farm in 2006-2009. But PSE did not acquire Mint Farm until December 2008.
 - c. My five-year average includes \$0 for non-contract major maintenance for Goldendale in 2005. But PSE did not acquire Goldendale until 2007.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED at Olympia, Washington, this 16th day of February, 2012.


ALAN P. BUCKLEY