

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED: December 21, 2011  
DOCKETS: UE-111048/UG-111049  
REQUESTER: Puget Sound Energy

WITNESS: Deborah J. Reynolds  
RESPONDER: Deborah J. Reynolds  
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**PSE Data Request No. 021 to WUTC Staff:**

RE: Deborah J. Reynolds, Exhibit No. \_\_\_ (DJR-1T), page 30, lines 5-7

Please reconcile the fact that the Commission must determine whether an investor-owned utility met its conservation target, per RCW 19.285.060(6), with the assertion that these savings are not "known and measurable."

**RESPONSE:**

The Commission must determine whether an investor-owned utility met its conservation target per RCW 19.285.060(6) in the context of the Northwest Power and Conservation Council's methodology, which relies on engineering estimates of savings instead of known and measurable changes in use between a general rate case test period and a rate-effective period.