

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

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DOCKET UG-230393

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

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**EXHIBIT RLE-8**

Puget Sound Energy Response to Public Counsel's Data Request No. 24

**September 8, 2023**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION****Docket UG-230393  
Puget Sound Energy  
Tacoma LNG Tracker****PUBLIC COUNSEL DATA REQUEST NO. 024:****Re: Early February Vaporizations. Direct Testimony of Ronald J. Roberts, Exh. RJR-1T at 41:1–42:2**

- a. Please answer yes or no. Does PSE assert that absent vaporization from the Tacoma LNG facility that curtailments to PSE core customers would have been required?
- b. If the answer to subpart a. is yes, please provide evidence with supporting documentation that curtailment would have been necessary absent vaporization from the Tacoma LNG facility.
- c. If the answer to subpart a. is no, please explain what PSE means by “required PSE to use the Tacoma LNG Facility.”
- d. Please answer yes or no. Does PSE assert that absent vaporization from the Tacoma LNG facility that curtailments to PSE non-core customers would have been required?
- e. If the answer to subpart d. is yes, please provide evidence with supporting documentation that curtailment to non-core gas customers would have been necessary absent vaporization from the Tacoma LNG facility.
- f. If the answer to subpart d. is no, please explain what PSE means by “required PSE to use the Tacoma LNG Facility.”

**Response:**

Puget Sound Energy (“PSE”) objects to Public Counsel Data Request No. 024 to the extent it mischaracterizes testimony. Public Counsel Data Request No. 024 oversimplifies the complex decisions involved in maintaining gas system reliability in a way that mischaracterizes PSE’s decision to exercise Tacoma LNG Vaporization utilizing post-facto reasoning. Without waving its objections and subject thereto, PSE answers as follows: PSE implemented Vaporizer gas-injection operations upon being informed of Enbridge’s Westcoast T-South natural gas pipeline system (“T-South system”) experiencing a curtailment on one of two main lines which limited transport capacity to less than 64% of capacity. At the time, it was unknown whether further restrictions on both pipelines were imminent, which would limit all gas transport from Canada. PSE placed Tacoma LNG on-line for gas-injection in a preparatory position to buttress system reliability and mitigate any potential

trickle-down effects of a full BC Pipeline curtailment; a condition directly in-line with the original stated goals of the Tacoma LNG Facility.