

**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-13**

Legal Fees

**September 8, 2023**

**Ratepayer refund for 2013 - 2016**

(a)	\$	1.0 million	per year
(b)		4 years	(2013-2016)
(c) = (a) x (b)	\$	4.0 million	
(d)		57% amount that should have been allocated to Puget LNG	
(e) = (c) x (d)	\$	2.28 million	ratepayer refund

**Three month gap with no internal legal costs**

Month	External Legal Costs
Sep-22	\$ 334,639.47
Oct-22	\$ 51,907.47
Nov-22	\$ 32,212.70
<b>Total</b>	<b>\$ 418,759.64</b>

Data from PSE Resp. to PC DR 26, Attachment A

**Internal Legal Costs vs. External Legal Costs**

	Internal Legal Costs	External Legal Costs	Internal legal costs as a percent of external legal costs
Apr-17	\$ 4,134.60	\$ 162,097.79	2.0%
May-17	\$ 6,431.60	\$ 114,584.80	
Jun-17	\$ 3,583.32	\$ 274,422.82	
Jul-17	\$ 722.04	\$ 69,504.64	
Aug-17	\$ 2,067.30	\$ 39,934.67	
Sep-17	\$ -	\$ 16,756.00	
Oct-17	\$ 3,767.08	\$ 357,669.39	
Nov-17	\$ -	\$ 120,239.90	
Dec-17	\$ 6,569.42	\$ 60,312.61	
Jan-18	\$ 1,328.88	\$ (36,992.53)	
Feb-18	\$ 15,187.20	\$ 116,801.67	
Mar-18	\$ 5,457.90	\$ 124,670.74	
Apr-18	\$ 7,878.36	\$ 110,755.45	
May-18	\$ 4,840.92	\$ 97,766.54	
Jun-18	\$ 2,278.08	\$ 68,295.77	
Jul-18	\$ 1,328.88	\$ 29,958.98	
Aug-18	\$ 759.36	\$ 90,571.40	
Sep-18	\$ 3,227.28	\$ 54,835.61	
Oct-18	\$ -	\$ 43,508.35	
Nov-18	\$ 21,262.08	\$ 90,062.04	
Dec-18	\$ 1,898.40	\$ 88,788.42	
Jan-19	\$ 3,838.77	\$ (20,538.17)	
Feb-19	\$ 3,149.76	\$ 37,807.34	
Mar-19	\$ -	\$ 34,927.11	
Apr-19	\$ 3,051.33	\$ 16,338.33	
May-19	\$ 16,733.10	\$ 43,449.43	
Jun-19	\$ 4,724.64	\$ 78,796.53	
Jul-19	\$ 6,004.23	\$ 27,027.08	
Aug-19	\$ 5,019.93	\$ 48,714.75	
Sep-19	\$ 196.86	\$ 38,237.23	
Oct-19	\$ 4,724.64	\$ 47,906.50	
Nov-19	\$ 4,527.78	\$ 15,071.18	
Dec-19	\$ 5,167.58	\$ 95,238.97	
Jan-20	\$ 10,273.44	\$ 314.40	
Feb-20	\$ 4,179.88	\$ 96,487.25	
Mar-20	\$ 8,057.60	\$ 368,206.11	
Apr-20	\$ 4,935.28	\$ 176,139.24	
May-20	\$ 8,762.64	\$ 164,356.48	
Jun-20	\$ 7,654.72	\$ 212,795.15	
Jul-20	\$ 2,618.72	\$ 267,707.39	
Aug-20	\$ 9,820.20	\$ 209,045.83	
Sep-20	\$ 5,539.60	\$ 249,640.35	
Oct-20	\$ 3,676.28	\$ 1,355,612.89	
Nov-20	\$ 11,633.16	\$ 571,995.39	
Dec-20	\$ 10,928.12	\$ 1,853,647.39	
Jan-21	\$ 13,569.33	\$ (83,119.47)	
Feb-21	\$ 9,370.53	\$ 1,089,481.46	
Mar-21	\$ 13,825.36	\$ 815,977.77	
Apr-21	\$ 11,725.95	\$ 1,695,758.22	
May-21	\$ 2,457.84	\$ 1,959,269.69	
Jun-21	\$ 1,894.59	\$ 348,635.22	
Jul-21	\$ 972.90	\$ 65,196.09	
Aug-21	\$ 788.02	\$ 28,752.44	
Sep-21	\$ 1,266.88	\$ 21,912.17	
Oct-21	\$ 358.44	\$ 16,903.67	
Nov-21	\$ 1,126.51	\$ 38,315.02	
Dec-21	\$ 1,894.59	\$ 56,706.87	
Jan-22	\$ 703.30	\$ 80,602.80	
Feb-22	\$ 703.30	\$ 46,704.78	
Mar-22	\$ 1,661.64	\$ 227,678.78	
Apr-22	\$ 919.70	\$ 128,492.85	
May-22	\$ 108.20	\$ 65,916.97	
Jun-22	\$ 750.28	\$ 57,680.94	
Jul-22	\$ 54.10	\$ 101,379.58	
Aug-22	\$ 1,460.70	\$ 147,737.82	
Sep-22	\$ -	\$ 334,639.47	
Oct-22	\$ -	\$ 51,907.47	
Nov-22	\$ -	\$ 32,212.70	
Dec-22	\$ 6,716.42	\$ 110,418.66	
Jan-23	\$ -	\$ (26,052.06)	
Feb-23	\$ 978.96	\$ 50,500.67	
Mar-23	\$ -	\$ 19,295.76	
Apr-23	\$ 1,835.55	\$ 53,462.99	
May-23	\$ -	\$ 26,918.17	
Jun-23	\$ 1,101.33	\$ 9,077.50	
	<b>\$ 314,185.38</b>	<b>\$ 15,655,834.21</b>	