

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKETS UE-220066, UG-220067, and UG-210918 (*Consolidated*)

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

EXHIBIT RLE-20

Puget Sound Energy Response to Public Counsel Data Request No. 354

September 9, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-220066 & UG-220067
Puget Sound Energy
2022 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 354:

REQUESTED BY: Robert Earle

Tacoma LNG

Re: Tacoma LNG Project. 2009 IRP. Ronald J. Roberts, Exh. RJR-3 at 2–3.

- a. Please provide the underlying data in Excel format for each of the figures in Chapter 6 and Appendix J of the 2009 IRP.
- b. Please provide the gas demand/load forecasts (all scenarios) used for the 2009 IRP. Please include all underlying data in Excel format, a description of the methodology, and output in excel.
- c. For each of the load forecast years used in the 2009 IRP, how many days in each year did Puget Sound Energy (PSE) forecast a shortage, and what was the shortage amount for each day?
- d. Please provide details on the gas for generation demand depicted in Figure 6-2 of the 2009 IRP at 6-4 including a list of the power plants comprising that demand, their respective MW nameplate rating, the plant owner(s), whether they are dual-fuel facilities, whether they are connected with the PSE gas distribution system or whether they are connected with the PSE gas transmission system, and whether they are connected with the PSE electric distribution system or whether they are connected with the PSE electric transmission system.

Response:

Puget Sound Energy (“PSE”) objects to Public Counsel Data Request No. 354 as overbroad and unduly burdensome because it would require PSE to retrieve and reproduce files for “each figure” in a chapter from an IRP that was produced over 12 years ago. PSE further objects to Public Counsel Data Request No. 354 as vague and ambiguous, to the extent the phrase “each of the forecast years” is not properly defined for purposes of the request. PSE also objects to Public Counsel Data Request No. 354 as overbroad and not reasonably calculated to lead to the discovery of admissible evidence relevant to the Tacoma LNG Facility because none of the gas-fired power plants are connected to PSE’s gas distribution system or to any PSE gas system

transmission facilities. Subject to and without waiving this objection, PSE responds as follows:

- a. The figures in Chapter 6 and Appendix J of the 2009 IRP demonstrate the relative range of data and outcomes and were available for detailed analysis by participants in the IRP process at the time. The IRP is documentation of the planning process and by itself does not demonstrate the prudence of any particular transaction or decision. The results of each IRP point PSE in the general direction of preferred options, but PSE continues to monitor and consider developing alternatives, which are examined ad hoc or in future IRPs. Attached as Attachment A to PSE's Response to Public Counsel Data Request No. 354 is an Excel file, which contains the support for the figures in Chapter 6 and Appendix J of the 2009 IRP. Certain figures in Chapter 6 and Appendix J of the 2009 IRP are tables in Word format; the underlying data is the same data that is in the table and is not produced as part of this response.
- b. See response to part a above. The load forecast scenarios are in the MS Excel files from which the applicable figures were derived. A description of the various forecast scenarios are in the IRP. Attached as Attachment B to PSE's Response to Public Counsel Data Request No. 354 is an MS Excel file showing the base case Load Forecast, expected Demand Side Resources, Supply Resources and the resulting surplus or shortfall for the respective IRP and annual load forecasts.
- c. Resource need is based on the Design Peak Day condition when all existing resources are fully utilized and there is still an un-served demand. Each load forecast scenario would have a unique calculated design peak volume per year. The design peak volume is based on PSE's planning standard, forecasted customer count, and customer use per degree day, taking into account the impact of existing demand side resources. The IRP model attempts to find the least cost resource, either supply-side or demand-side to fill the need on the design peak day. Planning model runs would incorporate one peak-day, with the balance of days based on normalized temperature. Thus, it is likely that each scenario would have only one peak day per year with a shortfall. Attached as Attachment B to PSE's Response to Public Counsel Data Request No. 354 is the shortfall or surplus on the design peak day for each year of each annual (and IRP) forecast. When a shortfall arises in one year, there will be only one day with the shortfall, but without a new resource, future years would continue to have more and more days of shortfall.
- d. The PSE IRP process involving the Tacoma LNG facility is planning for service to PSE's gas system customers, who are different from, and whose gas needs are analyzed separately from, the gas needs of electric system customers. It would be inappropriate to plan to reduce service to electric customers in order to redistribute capacity to serve gas customers. The Tacoma LNG Facility was constructed for the dual purposes of meeting the peak-day supply for PSE's

regulated gas distribution system customers and to dispense LNG to other non-regulated end-use customers of Puget LNG primarily as transportation fuel. Although none of the power plants are connected to PSE's gas distribution system, or to any PSE gas system transmission facilities, PSE included Figure 6-2 to demonstrate that there was already an existing shortfall in Gas for Generation resources and thus there was only a short-term surplus of capacity on the Gas Sales portfolio leading to the conclusion that there were no obvious long-term optimization opportunities between the two portfolios.

**ATTACHMENTS A and B to PSE's
Response to
Public Counsel Data Request No. 354**