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-22

Puget Sound Energy Response to Public Counsel Data Request No. 387

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. 387:
Requested by: Robert Earle

Tacoma LNG

Re: Tacoma LNG Project. Direct Testimony of Ronald J. Roberts, Exh. RJR-1CT at 58:13, Table 6, Major Actions of the PSE Board of Directors (in the row labeled Jan. 23, 2013); Ronald J. Roberts, Exh RJR-5C.

a. Please provide backup for the immediate forecast need of 13.65 MDth/day including input and output data in Excel.
b. For each year from 2014 to 2033, please provide the number of days for which an unmet need was forecast and the amount in MDth of the unmet need for each day with an unmet need.
c. What was the total MDth unmet need forecast for each year 2014 to 2033?
d. Absent demand from gas-fired generation, would there have been any unmet needs in the forecast? Please provide documentation and support for your answer.
e. The figure 13.65 MDth/day does not seem to appear in Ronald J. Roberts, Exhibit RJR-5C.
    i. Please answer yes or no. Was the figure 13.65 MDth/day presented to the PSE Board of Directors?
    ii. If the answer to subpart e.i. is yes, please provide those presentation materials and explain why they were not previously provided.
    iii. If the answer to subpart e.i. is no, please explain why this figure was not presented to the PSE Board of Directors but cited in the Direct Testimony of Ronald J. Roberts, Exhibit RJR-1CT.
f. Please point to the locations in the January 23, 2013, board presentation where the forecasted need for peaking day needs was discussed.
g. What was the actual need (MDth/day) realized in 2019–2020?

Response:

a. See Attachment B to PSE's Response to Public Counsel Data Request No. 354 for the then most recent Load Forecast, expected Demand Side Resources, Supply Resources, and the resulting surplus or shortfall for the respective load forecasts. In the Column labeled "Surplus/Shortfall-F2012" (column AG) on tab

"Net Demand less Supply", the expected shortfall in resources beginning in Winter 2019-20 is shown.

b. 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. See Attachment B to PSE's Response to Public Counsel Data Request No. 354 for the shortfall or surplus on 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 days of shortfall.

c. See Attachment B to PSE's Response to Public Counsel Data Request No. 354 for the then most recent Load Forecast, expected Demand Side Resources, Supply Resources, and the resulting surplus or shortfall for the respective load forecasts. In the Column labeled "Surplus/Shortfall-F2012" (column AG) on tab "Net Demand less Supply" is shown the expected shortfall in resources beginning in Winter 2019-20.

d. Yes. Gas for generation is not a part of the gas sales forecast or the peak-day planning for the PSE gas system. There are no PSE generation facilities connected to PSE's gas distribution system.

e. The figure 13.65 MDth/day does not appear in the Fourth Exhibit to the Prefiled Direct Testimony of Ronald J. Roberts, Exh. RJR-5C.

   i. No.

   ii. Not applicable.

   iii. See the response to subpart f below. The PSE Board of Directors was aware of the PSE long-term planning process documented with the Integrated Resource Plan. It was not necessary to provide the PSE Board of Directors with the detail of the exact shortfall. The figure was included in testimony to demonstrate the exact data that PSE was relying upon when it went to the PSE Board of Directors.

f. Please refer to pages 69, 72, 74, 75 ,76, 90 in Exh. RJR-5(C) as a part of the January 23, 2013 PSE Board of Directors meeting.

g. The need for a given year is based on the design day forecast for that year. The actual need forecasted in the contemporaneous studies at the time of the January 23, 2013 PSE Board of Directors meeting for the Winter 2019-20 was 13.65 MDth/day.