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-23

Puget Sound Energy Response to Public Counsel Data Request No. 388

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. 388:
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 Nov. 8, 2013); Ronald J. Roberts, Exh. RJR-5C.

a. Please provide backup for the immediate forecast need of 19.24 MDth/day including input and output data in Excel.
b. For each year from 2014 to 2034, 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 2034?
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 19.24 MDth/day does not seem to appear in Ronald J. Roberts, Exhibit RJR-5C.
    i. Please answer yes or no. Was the figure 19.24 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. Ronald J. Roberts Exhibit, RJR-5C at 161 says the 2013 IRP shows peaking needs grows to 141,000 Dth per day of need by 2022/23. Is this prediction still PSE's forecast for 2022/23? Please explain why or why not.
g. What was the actual need (MDth/day) realized in 2017–2018?

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-F2013" (column AH) on tab "Net Demand less Supply" is shown the expected shortfall in resources beginning in Winter 2017-18.

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 has 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 incorporate one peak-day, with the balance of days based on normalized temperature. Thus, it is likely that each scenario has 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-F2013" (column AH) on tab "Net Demand less Supply" is the expected shortfall in resources beginning in Winter 2017-18.

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 19.24 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. The PSE Board of Directors was aware of the PSE long-term planning process documented with the IRP. 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. No. PSE updates its long-term load forecast and need assessment every year and performs a very detailed and documented planning process in the Integrated Resource Plan every two years. Forecasts are updated for economic conditions that impact customer count, and evolving changes in usage patterns in response to weather, conservation, and other influences. Thus, even if existing supply resources remained constant, the forecast need for any future year would likely be different from one forecast to the next.

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 November 8, 2013 PSE Board of Directors meeting for the Winter 2017-18 was 19.24 MDth/day.