

**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-25

Puget Sound Energy Response to Public Counsel Data Request No. 395

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. 395:

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 (row labeled April 28, 2015); Ronald J. Roberts, Exh RJR-5C.

- a. Please provide backup for the immediate forecast need of 2.4 MDth/day including input and output data in Excel.
- b. For each year from 2016 to 2036, 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 2016 to 2037?
- 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 2.4 MDth/day does not seem to appear in Ronald J. Roberts, Exhibit RJR- 5C.
 - i. Please answer yes or no. Was the figure 2.4 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.

Response:

This request is a duplicate of Public Counsel Data Request No. 394. Please see Puget Sound Energy's Response to Public Counsel Data Request No. 394 for the requested information.