

PSE Response to Public Counsel Data Request
No. 378

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

PUBLIC COUNSEL DATA Request No. 378:

Tacoma LNG

Re: Tacoma LNG Project. Puget Sound Energy Response to Public Counsel Data Request 312.

- a. Please answer yes or no. Could the curtailments at Fredonia listed in the response to sub-part c. other than the curtailment in 2018 have been alleviated by the existence of the Tacoma LNG Project?
- b. If the answer to sub-part a. is yes, please explain how the Tacoma LNG Project would have been able to alleviate curtailments due to operational failures on Cascade Natural Gas facilities.
- c. Please provide support and along with documentation for the statement that “if a peak event occurs, both Puget Sound Energy (PSE) gas system needs and gas generation needs may be very likely be coincident...”
- d. Please provide data with the hourly natural gas demand and hourly electricity demand for the past 10 years on PSE’s natural gas and electric systems.

Response:

- a. No. Natural gas is delivered to the Fredonia power plant from the Cascade Natural Gas Company gas distribution system, not the Puget Sound Energy ("PSE") gas distribution system.
- b. Not applicable.
- c. Both PSE’s gas system and electric system provide service to highly temperature sensitive demand territory. The service territories of both the gas system and the electric system are concentrated in the Puget Sound region and approximately 50% of electric customers are also gas customers. During extremely cold conditions (such as approaching design peak conditions on the gas system) generation from wind resources tends to be lower, which may place greater reliance on gas-fired generation. PSE must plan to serve the design peak hour on the electric system and design peak day conditions on the gas system, which could be coincident. Please also see subpart d below.

- d. PSE objects to Public Counsel Data Request No. 378 as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. None of the PSE gas-fired power plants are connected to PSE's gas distribution system. Subject to and without waiving these objections, PSE responds as follows: PSE does not have hourly gas usage data for the gas distribution system. The gas system is operated on a daily volume basis, but metering of total inputs to the system are metered monthly. PSE estimates total gas system volumes daily based on partial telemetry data. Attached as Attachment A to PSE's Response to Public Counsel Data Request No.378, please find an MS Excel file showing estimated daily gas system deliveries and approximate daily gas deliveries to PSE gas-fired generating plants for the period 2012 through 2021.

**ATTACHMENT A to PSE's Response to
Public Counsel Data Request No. 378**