

Exh. KBS-5C
Dockets UE-190529/UG-190530 and
UE-190274/UG-190275 (*consolidated*)
Witness: Kathi B. Scanlan

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-190529
and UG-190530 (*consolidated*)**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For an Order Authorizing Deferral
Accounting and Ratemaking Treatment
for Short-life UT/Technology Investment**

**DOCKETS UE-190274 and
UG-190275 (*consolidated*)**

EXHIBIT TO TESTIMONY OF

Kathi B. Scanlan

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE Response to Staff Data Request Nos. 094, 095C, 096C

November 22, 2019

REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

WUTC STAFF DATA REQUEST NO. 094:

Re: Green Direct

Referencing the direct testimony of Mr. Einstein, Exh. WTE-1CT at 14:2-6, related to unanticipated delays of the Skookumchuck project, please provide updated milestone dates including: energization, test energy, and commercial operation. As part of this response, please include relevant documentation of communication related to these delays with the company's board of directors.

Response:

The bullets below outline the updated milestones as provided to Puget Sound Energy ("PSE") by the developer, as their best estimate for completion of each:

- All Turbine Deliveries Complete – 10/22/2019
- All Foundations Complete – 11/27/2019
- Project pre-Commissioning Complete – 1/3/2020
- Full Commissioning Complete; Ready for Grid – 1/9/2020
- Guaranteed Substation Completion – 1/25/2020
- Commercial Operation Date ("COD") Testing – 1/28/2020
- Guaranteed COD Conditions Completion – 1/26/2020
- Final Completion – 2/14/2020

With regards to relevant documentation of communication related to these delays with PSE's Board of Directors, PSE does not have any such documentation as a delay of 12 months did not require Board approval.

REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

WUTC STAFF DATA REQUEST NO. 095

“CONFIDENTIAL” Table of Contents

DR NO.	“CONFIDENTIAL” Material
095	Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-190529 and UG-190530 as marked in Puget Sound Energy’s Response to WUTC Staff Data Request No. 095.

REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

WUTC STAFF DATA REQUEST NO. 095:

Re: Green Direct

Referencing Exh. WTE-3C at Page 20 at (d)(i), please provide the actual cumulative liquidated damages (LD) PSE received to date as a result of delays related to Skookumchuck project. As part of this response, please detail monthly totals of actual LD received listed by FERC account(s), including how the company is booking LD related to the Skookumchuck Project.

SHADED INFORMATION IS DESIGNATED AS
CONFIDENTIAL PER PROTECTIVE ORDER IN WUTC
DOCKETS UE-190529 AND UG-190530

Response:

Puget Sound Energy ("PSE") has received [REDACTED] in liquidated damages through September 30, 2019, related to the Skookumchuck project.

Refer to the below table for amounts received by month and the FERC account to which these amounts were initially recorded. Refer to PSE's response to WUTC Staff Data Request No. 097 for further discussion regarding the ultimate recording of these liquidated damages.

FERC Account	Month/Year	Amount
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-190529 and UG-190530 as marked in PSE's Response to WUTC Staff Data Request No. 095.

REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

WUTC STAFF DATA REQUEST NO. 096

“CONFIDENTIAL” Table of Contents

DR NO.	“CONFIDENTIAL” Material
096	Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-190529 and UG-190530 as marked in Puget Sound Energy’s Response to WUTC Staff Data Request No. 096.

REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

WUTC STAFF DATA REQUEST NO. 096:

Re: Green Direct

Referencing Exh. WTE-3C at Page 20 at (d)(i), please provide the projected cumulative liquidated damages (LD) PSE anticipates receiving as a result of delays related to Skookumchuck project. As part of this response, please detail monthly totals of LD projected, listed by FERC account(s), including how the company is planning to book LD related to the Skookumchuck Project.

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DOCKETS UE-190529 AND UG-190530

Response:

Please refer to the below table for projected liquidated damage amounts related to the Skookumchuck project to be received by month.

With respect to the FERC account, please refer to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 097. The determination of the treatment of liquidated damages has not been finalized but it is likely these amounts may be treated as a deferred liability.

FERC Account	Month/Year	Projected Amount
[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]

Projected liquidated damages are based on the achievement of the updated milestones provided in PSE's Response to WUTC Staff Data Request No. 094.

Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-190529 and UG-190530 as marked in PSE's Response to WUTC Staff Data Request No. 096.