

**Exh. KBS-6
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. 182 and 183

November 22, 2019

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

WUTC STAFF DATA REQUEST NO. 182:

Re: Green Direct

Referencing the direct testimony of Mr. Einstein, Exh. WTE-1CT, does Mr. Einstein intend to correct or update any data or information related to the Skookumchuck Wind Energy PPA, Lund Hill Solar PPA, or Green Direct program in the company's response testimony? If yes, please explain.

Response:

Consistent with the procedural schedule (Attachment B to Order 03) and the Washington Utilities and Transportation Commission's ("Commission") procedural rules, Puget Sound Energy ("PSE") does not plan to file response testimony in this docket addressing Green Direct projects or any other topic. PSE will file rebuttal testimony on January 15, 2020. The content of that rebuttal testimony is not yet known and will depend on the issues raised by other parties in their response testimony filed on November 22, 2019. PSE may update the Commission on the status of the Skookumchuck Power Purchase Agreement ("PPA") including the status of liquidated damages under the PPA in its rebuttal testimony.

PSE does intend to file a separate adjustment to Schedule 139 to update the timing of the commencement of customer billing given that no power will be delivered to Schedule 139 customers in 2019.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

WUTC STAFF DATA REQUEST NO. 183:

Re: Green Direct

Referencing the direct testimony of Mr. Einstein, Exh. WTE-1CT and PSE's response to UTC Staff Data Request No. 097, does PSE intend to revise Tariff WN U-60, Schedule 139, Voluntary Long Term Renewable Energy Purchase Rider? If yes, please provide a description of the timing and content of the prospective filing(s) related to Schedule 139.

Response:

Puget Sound Energy ("PSE") does not intend to revise Tariff WN U-60 in relation to the Liquidated Damages ("LDs"), as outlined in PSE's Response to WUTC Staff Data Request No. 097. PSE does intend to petition the Washington Utilities and Transportation Commission for an order authorizing deferred accounting treatment related to PSE's receipt of LDs associated with the Schedule 139 Voluntary Long Term Renewable Energy ("Green Direct") program. PSE will be seeking authority to defer LDs and use them to offset other Green Direct program costs as was intended by RCW 19.29A.090(5).

As outlined in PSE's Response to WUTC Staff Data Request No. 182, PSE does intend to file an adjustment to pricing in recognition of delays related to the online date for Skookumchuck Wind, and to better align customer pricing with the timing in the Power Purchase Agreements. Such a filing will be made when the online date of the Skookumchuck project is known with a high degree of certainty.