

BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-170033 and UG-170034

DECLARATION OF JASON L. BALL

1. My name is Jason L. Ball, and I am a regulatory analyst at the Washington Utilities and Transportation Commission (Commission). My business address is 1300 Evergreen Park Drive SW, Olympia, Washington 98504.

2. I am over the age of twenty-one, have personal knowledge of the facts set forth herein, and am competent to testify to those facts.

3. I am the same Jason L. Ball who filed testimony on behalf of Commission Staff (Staff) in this proceeding, addressing cost of service, rate spread, and rate design.

4. The purpose of this declaration is to present facts in support of Staff's motion for leave to file supplemental testimony in this case. I will describe in particular the discovery issue that has prompted Staff's motion, the new information contained in my rebuttal testimony, and why Staff believes it is necessary to supplement the record.

5. On January 13, 2017, Puget Sound Energy (PSE or Company) filed a general rate case with the Washington Utilities and Transportation Commission (Commission). One of my assignments in that case was to present Staff's response to the Company's proposed cost of service, rate spread, and rate design. As part of the assignment, I read the direct testimony of Company witness John Piliaris, who presented the majority of the Company's case relating to cost of service, rate spread, and rate design, among other matters. I also issued numerous data requests to the Company and other intervening parties.

6. On May 18, 2017, I issued Staff data request 443 that stated:

Referring to Exhibit Nos. JAP-8 and JAP-9 of Jon A. Piliaris, please provide updated exhibits using a demand allocator based on the average of the top 5 peak days in each of the last three years. Please include any supporting workpapers in a fully functional Excel format with all workbooks, worksheets, data, and formulae left intact.

7. On June 5, 2017, PSE responded to Staff data request 443 with five attachments, labeled A through E. Attachment A showed the special contract class of natural gas customers as paying at or near its cost of service. I relied on PSE's response to Staff data request 443 in developing my responsive testimony.

8. I conducted extensive analysis and wrote testimony based on PSE's response to Staff data request 443, which I believed to be correct. Due to the Company's response showing natural gas special contract customers paying the approximate cost of service, I removed an argument from my initial testimony that recommended that the imputation of any shortfall or excess in revenues from that class of customers go to shareholders.

9. On August 2, 2017, PSE filed a supplemental response to Staff data request 443. The Company's supplement response acknowledged and corrected errors in

the initial response. Those corrections show the special contract class of natural gas customers paying approximately one-half the cost of service.

10. Staff conducted substantial analysis and filed testimony under the misconception that the special contract class of natural gas customers was paying its approximate cost of service.

11. I did not have the correct information contained in PSE's supplemental response until August 2, 2017.

12. I have analyzed PSE's supplemental response to Staff data request 443 and determined that the newly available information materially affects my position and changes portions of my responsive testimony.

13. Updating the evidentiary record to reflect the new information presented in the Company's supplemental response will require additional substantive analysis that can best be communicated, and responded to, through additional prefiled testimony and exhibits.

DATED at Olympia, Washington, and effective this \_\_\_\_ day of August 2017.

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Jason L. Ball