

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

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DOCKET UG-230968

**CROSS-ANSWERING TESTIMONY OF DR. ROBERT L. EARLE  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT RLE-3C**

**PSE's Response to Public Counsel Data Request No. 2**

September 12, 2024

**Shaded Information is Designated Confidential Per WAC 480-07-160**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UG-230968  
Puget Sound Energy  
2023 Climate Commitment Act**

**PUBLIC COUNSEL DATA REQUEST NO. 002**

**“CONFIDENTIAL” Table of Contents**

	<b>“CONFIDENTIAL” Material</b>
<b>Data Request No. 002</b>	Shaded information is designated as CONFIDENTIAL per Protective Order in Docket UG-230968 as marked in Attachment A to Puget Sound Energy’s Response to Public Counsel Data Request No. 002.

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UG-230968  
Puget Sound Energy  
2023 Climate Commitment Act**

**PUBLIC COUNSEL DATA REQUEST NO. 002:**

**Re: CCA Data. Direct Testimony of Christopher T. Mickelson, Exh. CTM-1CT at 5:1–6:7.**

- a. Please provide in Excel format from the earliest data available through June 14, 2024, all the trade data available for CCA allowance permits. Please include the price per permit, the vintage, any information available on the amount traded, bid-ask spread, and the source of the information. If multiple sources are available, please provide the data requested from each source.
- b. Please list and describe the sources for the trade data that PSE proposes to use in calculating the proposed CCA RSM.
- c. In calculating the CCA RSM, does PSE propose using data from all of a four-year compliance period, or does PSE propose using data from the four years of a compliance period plus the period in the next year until the November 1 deadline.
- d. If PSE does not propose including data through the November 1 deadline of the year after the compliance period ends, please explain why.

**Response:**

- a. Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 002 is a MS Excel file containing CCA allowance, also known as Washington Carbon Allowance ("WCA"), trade data from the earliest available date through June 14, 2024. This file includes the daily settlement price per WCA, vintage, and trade price from Nodal Exchange.

At this time, PSE does not have access to historical WCA trade data on the Intercontinental Exchange ("ICE").

- b. PSE proposes to use trade data from Nodal Exchange and ICE, if available.
- c. PSE proposes to use data from the entire four-year compliance period up to November 1 deadline of the following year. This approach ensures that all relevant data is considered for a comprehensive analysis.

- d. Not applicable. PSE does propose to include data through November 1 deadline of the following year, provided the vintage procured complies with the 4-year compliance period.

Shaded information is designated as CONFIDENTIAL per Protective Order in Docket UG-230968 as marked in Attachment A to PSE's Response to Public Counsel Data Request No. 002.

**PSE'S RESPONSE TO PUBLIC COUNSEL DATA  
REQUEST NO. 2 ATTACHMENT A IS ONLY PROVIDED  
ELECTRONICALLY DUE TO ITS VOLUMINOUS SIZE.**