

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.

Respondent.

DOCKETS UE-240004 & UG-240005 (Consolidated)

**CROSS-EXAMINATION EXHIBIT OF ANN E. BULKLEY
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT AEB-__X

Comparison of PSE and Proxy Group Companies - RRA Jurisdictional Rankings

October 28, 2024

**EXH. AEB-14
DOCKETS UE-240004/UG-240005
2024 PSE GENERAL RATE CASE
WITNESS: ANN E. BULKLEY**

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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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PUGET SOUND ENERGY,

Respondent.

Docket UE-240004

Docket UG-240005

**THIRTEENTH EXHIBIT (NONCONFIDENTIAL)
TO THE PREFILED DIRECT TESTIMONY OF**

ANN E. BULKLEY

ON BEHALF OF PUGET SOUND ENERGY

FEBRUARY 15, 2024

**COMPARISON OF PSE AND PROXY GROUP COMPANIES
RRA JURISDICTIONAL RANKINGS**

Ultimate Parent Company	Jurisdiction	[1]	[2]	
		RRA		
		Rank	Numeric Rank	
NiSource Inc.	Indiana	Average/1	4	
	Kentucky	Average/2	5	
	Maryland	Below Average/1	7	
	Ohio	Average/3	6	
	Pennsylvania	Above Average/2	2	
	Virginia	Average/2	5	
ALLETE, Inc.	Minnesota	Average/2	5	
Alliant Energy Corporation	Iowa	Above Average/3	3	
	Wisconsin	Above Average/3	3	
Ameren Corporation	Illinois	Average/2	5	
	Missouri	Average/3	6	
American Electric Power Company, Inc.	Arkansas	Average/1	4	
	Indiana	Average/1	4	
	Kentucky	Average/2	5	
	Louisiana (PSC)	Average/2	5	
	Michigan	Above Average/3	3	
	Ohio	Average/3	6	
	Oklahoma	Average/2	5	
	Tennessee	Above Average/3	3	
	Texas (PUC)	Average/3	6	
	Virginia	Average/2	5	
	West Virginia	Below Average/1	7	
	Avista Corporation	Alaska	Below Average/1	7
		Idaho	Average/2	5
		Oregon	Average/2	5
Washington		Average/3	6	
Black Hills Corporation	Arkansas	Average/1	4	
	Colorado	Average/1	4	
	Iowa	Above Average/3	3	
	Kansas	Below Average/1	7	
	Nebraska	Average/1	4	
	South Dakota	Average/2	5	
	Wyoming	Average/2	5	
CMS	Michigan	Above Average/3	3	
Duke Energy Corporation	Florida	Above Average/2	2	
	Indiana	Average/1	4	
	Kentucky	Average/2	5	
	North Carolina	Above Average/3	3	
	Ohio	Average/3	6	
	South Carolina	Average/3	6	
	Tennessee	Above Average/3	3	
Entergy Corporation	Arkansas	Average/1	4	
	Louisiana (NOCC)	Average/3	6	
	Louisiana (PSC)	Average/2	5	
	Mississippi	Above Average/3	3	
	Texas (RRC)	Average/1	4	
Eversource Energy, Inc.	Kansas	Below Average/1	7	
	Missouri	Average/3	6	
IDACORP, Inc.	Idaho	Average/2	5	
	Oregon	Average/2	5	
MGE Energy, Inc.	Wisconsin	Above Average/3	3	
NextEra Energy, Inc.	Florida	Above Average/2	2	
	Texas (RRC)	Average/1	4	

Ranking Legend

Description	Value
Below Average/3	9
Below Average/2	8
Below Average/1	7
Average/3	6
Average/2	5
Average/1	4
Above Average/3	3
Above Average/2	2
Above Average/1	1

Ultimate Parent Company	Jurisdiction	[1]	[2]
		Rank	Numeric Rank
NorthWestern Corporation	Montana	Below Average/1	7
	Nebraska	Average/1	4
	South Dakota	Average/2	5
OGE Energy Corporation	Arkansas	Average/1	4
	Oklahoma	Average/2	5
Pinnacle West Capital Corporation	Arizona	Below Average/3	9
Portland General Electric Company	Oregon	Average/2	5
Southern Company	Alabama	Above Average/1	1
	Georgia	Above Average/2	2
	Illinois	Average/2	5
	Mississippi	Above Average/3	3
	Tennessee	Above Average/3	3
	Virginia	Average/2	5
Wisconsin Energy Corporation	Illinois	Average/2	5
	Michigan	Above Average/3	3
	Minnesota	Average/2	5
	Wisconsin	Above Average/3	3
Xcel Energy Inc.	Colorado	Average/1	4
	Minnesota	Average/2	5
	New Mexico	Below Average/2	8
	North Dakota	Average/1	4
	South Dakota	Average/2	5
	Texas (RRC)	Average/1	4
	Wisconsin	Above Average/3	3
Proxy Group Average		Average/1 to Average/2	4.57
Puget Sound Energy	Washington	Average/3	6

Notes

[1] Source: State Regulatory Evaluations, Regulatory Research Associates, as of August 23, 2023.

[2] AA/1= 1, AA/2= 2, AA/3= 3, A/1= 4, A/2= 5, A/3=6, BA/1= 7, BA/2= 8, BA/3= 9