

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UG-230393  
Puget Sound Energy  
Tacoma LNG Tracker**

**PUBLIC COUNSEL DATA REQUEST NO. 046:**

**RE: Facility Liquefaction Activities. Puget Sound Energy's Response to Staff Data Request No. 026.**

Puget Sound Energy (PSE) stated that the Puget Sound Clean Air Agency (PSCAA) has not taken any enforcement action against Tacoma LNG or PSE due to production in excess of the permit limits. Is PSE's answer limited to production on May 18, 2023, or is PSE's answer that PSCAA has not taken any enforcement action related to exceeding permit limits?

**Response:**

Puget Sound Energy ("PSE") would like to clarify that on May 18, 2023, 234,076 gallons of LNG were produced from pipeline natural gas and 257,508 gallons of LNG were transferred to the storage tank. The difference between the two values reflects boil-off gas which is recycled back into the storage tank after undergoing liquefaction, but not treatment. Air emissions derive from the treatment of pipeline natural gas prior to liquefaction and not from the liquefaction step. Puget Sound Clean Air Agency ("PSCAA") has been informed of these values. While it is PSE's understanding that the limit applies to the production of LNG from pipeline natural gas, PSE has proposed to PSCAA to limit production at the facility to 250,000 gpd including boil-off gas that is re-liquefied and recycled back into the storage tank unless and until PSCAA confirms that it agrees with PSE's understanding. PSE called PSCAA's attention to the distinction between the production of LNG from pipeline natural gas and the total LNG transferred to the storage tank, as identified in PSE's Response to Public Counsel Data Request No. 045 on August 11, 2023, and followed up with additional information on September 6, 2023.

PSCAA has not issued any enforcement actions against Tacoma LNG or PSE due to production in excess of the permit limit for any date of production as of September 7, 2023.

On June 8, 2023, PSE received Notices of Violation ("NOVs") for the Tacoma LNG facility that are unrelated to historical production. As of September 7, 2023, PSCAA has not assessed fines for these events.