

EXH. DLJ-____X
DOCKETS NOS. UE-240004/UG-240005
2024 PSE GENERAL RATE CASE
WITNESS: DAVID LANDERS

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

DOCKET NOS. UE-240004 and UG-240005
(Consolidated)

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**CROSS-EXAMINATION EXHIBIT OF DAVID J. LANDERS
ON BEHALF OF THE
JOINT ENVIRONMENTAL ADVOCATES**

**EXHIBIT DJL-____X (NONCONFIDENTIAL)
PSE Response to JEA's Data Request No. 69**

October 28, 2024

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-240004 & UG-240005
Puget Sound Energy
2024 General Rate Case**

JEA DATA REQUEST NO. 069:

Refer to DJL-10T, pages 2, 4, 6, and 28 of 50, asserting that “over 90 percent of PSE’s planned gas plant capital expenditures are ‘non-discretionary.’” Please provide all analysis, calculations, workpapers, and documents in PSE’s possession that provide support for this assertion.

Response:

Puget Sound Energy (“PSE”) objects to JEA Data Request No. 069 to the extent it requests information that is publicly available or obtainable from some other source that is more convenient, less burdensome, or less expensive. Notwithstanding these objections, and subject thereto, PSE responds as follows:

Please see Attachment A to PSE’s Response to JEA Data Request No. 069 for an expansion of Table 5 provided in the Prefiled Direct Testimony of David J. Landers, Exh. DJL-1Tr, p. 26, which includes a breakout of discretionary vs. non-discretionary capital expenditures, along with applicable laws, requirements, and testimony sections in the Direct Prefiled Rebuttal Testimony of David J. Landers, Exh. DJL-10T documenting requirements that make investments non-discretionary.

Additionally, non-discretionary investments are described in the Prefiled Direct Testimony of David J. Landers, Exh DJL-1Tr at 17:9-11 as “dictated by law or driven by requirements relative to timing and/or scope outside of PSE’s direct control.”

**ATTACHMENT A to PSE's Response to
JEA Data Request No. 069**