

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,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

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

**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. 70**

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. 070:

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 admit that for some gas plant capital expenditures that are categorized as “non-discretionary,” PSE has some discretion over when and how the resource need driving the capital expenditure is met. For any answer other than an unqualified admission, please provide a detailed explanation.

Response:

Puget Sound Energy (“PSE”) objects to JEA Data Request No. 070 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:

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.” As further described in Exh. DJL-1Tr, at 17:15-27, these non-discretionary investments may be either “Planned” or “Unplanned.” In the case of “Planned” non-discretionary investments, PSE has the ability to evaluate alternatives and may have some flexibility in timing and ability to manage annual spend. Additional examples of both “Planned” and “Unplanned” non-discretionary investment scenarios are provided in the Prefiled Rebuttal Testimony of David J. Landers, Exh. DJL-10T, at 5:6-19.