

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. 74**

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. 074:

Refer To DJL-10T, page 19 of 50, stating “The timing of when pipeline system reliability expenditures are made to reduce the burden of CWAs is discretionary.” Could PSE use its discretion over the timing of pipeline system reliability expenditures to allow time to analyze whether the need for these expenditures could be met or deferred by non-pipe alternatives? For any answer other than “yes,” please provide a detailed explanation.

Response:

Puget Sound Energy (“PSE”) objects to JEA Data Request No. 074 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:

Yes, PSE is in fact delaying pipeline reinforcement projects through cold weather actions (“CWA”) to enable evaluation of non-pipe alternatives (“NPA”) that could obviate the need for some expenditures on pipeline projects for system reliability. As discussed in the Prefiled Rebuttal Testimony of David J. Landers, Exh. DJL-10T: 8-13, PSE has deferred projects that had previously been planned for pipeline capacity expansion and is using CWAs to enable time to evaluate non-pipe alternatives. PSE will apply its Targeted Electrification Pilot phase 2 described in the Prefiled Direct Testimony of John Mannetti, Exh. JM-1CT to electrify heating and hot water loads in Duvall, an area of PSE’s service territory determined most likely to achieve sufficient customer participation in targeted programs to address a current system reliability need. Notably, in Prefiled Response Testimony of Bradley T. Cebulko, Exh. BTC-1T p. 92:14 the Duvall proposal is noted as laudable in this current rate case, and PSE will apply learnings from this pilot to development of future NPAs. While PSE supports evaluating NPAs for reliability projects, it expects not all reliability needs will be fully met by NPA solutions in the near-term, as broad-scale gas demand response and electrification programs are still in their preliminary development phases across the industry.