

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. 76**

**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. 076:**

Refer To DJL-10T, page 18 of 50 and DJL-6 (Apdx. B), page 1 of 13. Please admit that even though Witness Landers characterizes PSE's obligation to serve customers as "a non-discretionary obligation," PSE has categorized spending for specific pipeline system reliability projects as "Discretionary." For any answer other than an unqualified admission, please provide a detailed explanation.

**Response:**

Puget Sound Energy ("PSE") acknowledges the obligation to serve customers is a statutory requirement and non-discretionary. As noted in the Prefiled Rebuttal Testimony of David J. Landers, Exh. DJL-10T, at 18:19-20, the obligation to serve customers is non-discretionary; however, how PSE chooses to fulfill this obligation, such as by implementation of cold weather actions ("CWA") or through pipeline reliability investments, is determined by PSE's discretionary planning process that includes consideration of availability, cost and reliability of resources for non-pipeline alternatives.