Exh. HSH-9
Dockets UE-260005, UG-260006 and UE-260113
Witness: Hannah S. Halliday

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, **Complainant,** **v.** **PUGET SOUND ENERGY,** **Respondent.**	**DOCKETS UE-260005 & UG-260006**
In the Matter of the Petition of **PUGET SOUND ENERGY** **For an Accounting Order Authorizing the Deferred Accounting Treatment for FERC Interest Associated with Mandatory Transmission Network Upgrades**	**DOCKET UE-260113 (Consolidated)**

EXHIBIT TO

TESTIMONY OF

HANNAH S. HALLIDAY

STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PSE Response to UTC Staff DR 220

July 28, 2026

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets UE-260005 & UG-260006
Puget Sound Energy
2026 General Rate Case

WUTC STAFF DATA REQUEST NO. 220

"CONFIDENTIAL" Table of Contents

	"CONFIDENTIAL" Material
Data Request No. 220	Shaded information in Attachment A to PSE's Response to WUTC Staff Data Request No. 220 is designated as HIGHLY CONFIDENTIAL per Protective Order in Dockets UE-260005 and UG-260006.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets UE-260005 & UG-260006
Puget Sound Energy
2026 General Rate Case

WUTC STAFF DATA REQUEST NO. 220:
REQUESTED BY: Hannah Halliday

RE: Weather Normalization in Revenue Requirement

Adjusting and assessing the weather normalization adjustment. Using the recalculated temperature adjustments from DR 219, kindly recalculate the following models:

a. The revenue requirement model for electric and gas, in WP-SEF-4-ELECTIC-REV-REQ-MODEL and WP-TJP-4-GAS-REV-REQ-MODEL. Please return the updated workpapers, and document any deltas in the revenue requirement model resulting from this recalculation using the updated weather normalization adjustment.

b. The embedded cost of service model for electric and gas, in WP-CTM-3-E-COS-MODEL and WP-JDT-3-G-COS-MODEL. Please return the updated workpapers, and document any deltas in the revenue requirement model resulting from this recalculation using the updated weather normalization adjustment.

Response:

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 220 to the extent it could be construed to suggest that the methodology that WUTC Staff Data Request No. 219 requested PSE to recalculate (i.e., a 20-year backward-looking historical "normal" that excludes climate model projections) is an appropriate basis for the weather normalization adjustment, the revenue requirement model, or the embedded cost-of-service model in this proceeding. As explained more fully in PSE's Response to WUTC Staff Data Request No. 218, the climate change-adjusted "normal" methodology PSE has applied here is consistent with the methodology developed in the 2023 Electric Progress Report (Sixth Exhibit to the Prefiled Direct Testimony of Craig J. Pospisil, Exh. CJP-7, Chapter 6, Section 2), applied in the 2025 Resource Planning Analysis (Seventh Exhibit to the Prefiled Direct Testimony of Craig J. Pospisil, Exh. CJP-8, Section 1.4.1), and uncontested in PSE's 2024 Multi-Year Rate Plan ("MYRP") proceeding, Dockets UE-240004, *et al*.

Subject to and without waiving the foregoing, and solely for the purpose of responding to WUTC Staff Data Request No. 220 Staff's request as a sensitivity analysis derived from PSE's Response to WUTC Staff Data Request No. 219, PSE responds as follows.

a. Attached as Attachment A to PSE's Response to WUTC Staff Data Request No. 220 is an updated electric revenue requirement model work paper, "260005-06-PSE-WP-SEF-4-ELECTRIC-REV-REQ-MODEL-26GRC-02-2026(HC).xlsx," reflecting the recalculated electric weather normalization adjustment from PSE's Response to WUTC Staff Data Request No. 219. The tab "Def, COC, ConvF" calculates the relevant delta values between the originally filed temperature adjustment method and the recalculated method and shows that the net revenue change increased by $1.8 million for Rate Year 1, increased by $16 thousand for Rate Year 2, and decreased by $1 thousand for Rate Year 3. There is no change to the overall revenue requirement for any of Rate Years 1 through 3; the rate-year revenue changes are attributable to updated billing-determinant coefficients derived from test-year weather-normalized volumes and applied to the rate years, consistent with the description provided in PSE's Response to WUTC Staff Data Request No. 219.

   Attached as Attachment B to PSE's Response to WUTC Staff Data Request No. 220 is an updated gas revenue requirement model work paper, "260005-06-PSE-WP-TJP-4-GAS-REV-REQ-MODEL-26GRC-02-2026.xlsx," reflecting the recalculated gas weather normalization adjustment from PSE's Response to WUTC Staff Data Request No. 219. The tab "Def, COC, ConvF" calculates the relevant delta values between the originally filed temperature adjustment method and the recalculated method and shows that the net revenue change increased by $10.3 thousand for Rate Year 1, decreased by $1.7 thousand for Rate Year 2, and decreased by $1.2 thousand for Rate Year 3. There is no change to the overall revenue requirement for any of Rate Years 1 through 3; the rate-year revenue changes are attributable to updated billing-determinant coefficients derived from test-year weather-normalized volumes and applied to the rate years, consistent with the description provided in PSE's Response to WUTC Staff Data Request No. 219.

   Because the recalculation does not change forecasted loads, no changes have been made to power costs, which remain as filed.

b. Attached as Attachment C to PSE's Response to WUTC Staff Data Request No. 220 is an updated electric embedded cost-of-service model work paper, "260005-06-PSE-WP-CTM-3-E-COS-MODEL-26GRC-02-2026.xlsx," reflecting the recalculated electric weather normalization adjustment from PSE's Response to WUTC Staff Data Request No. 219, including the resulting changes to the proforma allocators referenced in PSE's Response to WUTC Staff Data Request No. 219. The tab "E-Summary of Results" calculates the relevant delta values between the originally filed temperature adjustment method and the recalculated

method and shows the differences in test-year proposed revenue from rates and parity ratios by rate class.

Attached as Attachment D to PSE's Response to WUTC Staff Data Request No. 220 is an updated gas embedded cost-of-service model workpaper, "260005-06-PSE-WP-JDT-3-G-COS-MODEL-26GRC-02-2026.xlsx," reflecting the recalculated gas weather normalization adjustment from PSE's Response to WUTC Staff Data Request No. 219, including the resulting changes to the proforma allocators referenced in PSE's Response to WUTC Staff Data Request No. 219. The tab "G-Summary of Results" calculates the relevant delta values between the originally filed temperature adjustment method and the recalculated method and shows the differences in test-year proposed revenue from rates and parity ratios by rate class.

For the underlying recalculated temperature adjustments and the weather-normalization volume and revenue deltas that flow into the workpapers attached to this Response, please see PSE's Response to WUTC Staff Data Request No. 219. For the daily climate-normal calculation referenced in PSE's Responses to WUTC Staff Data Request Nos. 218 and 219, please see PSE's Response to WUTC Staff Data Request No. 221.

Shaded information in Attachment A to PSE’s Response to WUTC Staff Data Request No. 220 is designated as HIGHLY CONFIDENTIAL per Protective Order in Dockets UE-260005 and UG-260006.

ATTACHMENT A to PSE's Response to WUTC Staff Data Request No. 220

ATTACHMENT B to PSE's Response to WUTC Staff Data Request No. 220

ATTACHMENT C to PSE's Response to WUTC Staff Data Request No. 220

ATTACHMENT D to PSE's Response to WUTC Staff Data Request No. 220