ATTACHMENT C

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Dockets UE-190529 & UG-190530 Puget Sound Energy 2019 General Rate Case

WUTC STAFF DATA REQUEST NO. 172:

Re: COLSTRIP Units 3 and 4 Coal Contract

In his response to UTC Staff Data Request No. 57, Mr. Ron Roberts indicates that PSE is not planning to update power costs in its rebuttal testimony in this case to reflect the new coal contract for Colstrip Units 3 and 4.

In his response to UTC Staff Data Request No. 75, Subpart A, Mr. Wetherbee notes that the power cost update specified in the procedural schedule does not include the coal contract for Colstrip Units 3 & 4. He states: "*Typically, a new fuel contract would be included in a power cost update if it were finalized*." and cites a Commission order for the proposition that it is "Washington Utilities and Transportation Commission policy that power costs be set as closely as possible to costs that are reasonably expected to be incurred following the conclusion of a proceeding." (emphasis added by Staff).

In UTC Staff Informal Data Request No. 8 in UE-190324, PSE was asked to provide the contractually required minutes for each and every meeting of the Executive Committee and the Mine Operating Committee (from October of 2017 through present) as specified in Section 5.1 and 6.6 in the Amended Restated Coal Supply Agreement ("ARCSA") dated August 24, 1998.

In response, PSE provided the Mine Operating Committee notes for only two meetings (August 14 and November 13, 2018). PSE also indicated that the Executive Committee:

...<u>elected not to maintain and distribute notes of their meetings since discussion</u> centered around on-going coal contract negotiations.

UTC STAFF DATA REQUEST NO. 172:

Admit that PSE plans to seek recovery through the rates set in this case for the costs of the new Colstrip Units 3 and 4 coal contract.

Response:

Puget Sound Energy ("PSE") does not plan to seek recovery for the costs of the new Colstrip Units 3 and 4 coal contract through the rates set in this case. PSE's

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Supplemental Response to WUTC Staff Data Request No. 075 outlined that PSE does not currently have a plan to update power costs to include the new coal contract.