



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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November 15, 2024

**NOTICE OF BENCH REQUEST**  
**(Due by 5 p.m., Friday, November 22, 2024)**

RE: *Washington Utilities and Transportation Commission v. Puget Sound Energy*,  
Dockets UE-240004 and UG-240005 (*Consolidated*)

The following bench request is directed to Staff. Please respond no later than 5 p.m., Friday, November 22, 2024, by electronic filing with the Commission's Records Center. Please provide courtesy email copies to all parties and the presiding administrative law judge. If you have any questions concerning this request, please contact Judge Hughes at 360-664-1254 or via email at [bijan.hughes@utc.wa.gov](mailto:bijan.hughes@utc.wa.gov).

Bench Request No. 1:

- a. In Staff witness Kermode's revised natural gas revenue requirement exhibit (Exh. DPK-7r and DPK-8r) filed on August 14, 2024,<sup>1</sup> two discrepancies appear in certain calculations. On the "Detailed Summary" tab of Exh. DPK-8r at Column BB and BC, line 306 the requested rate of return (ROR) appears as 7.36 percent. However, Staff witness Parcell proposed a Rate Year 2 ROR of 7.37 percent, which appears at Columns E-AS, line 306 for the individual adjustments. The revenue requirement calculation at Columns BB and BC, line 309 appears to use the 7.36 percent value. Please confirm the correct ROR for line 306 or explain why two different values are used in Staff's calculations.
- b. In the same exhibit, Staff applies a conversion factor of 0.9547 for its "Restore Dcarb Tracker Costs" adjustment labeled "S-11.41" at Column AS, Line 246. At Column AS,

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<sup>1</sup> There is a corresponding motion for the revised exhibits. However, the same issues exist in Staff witness Kermode's original natural gas exhibits filed on August 6, 2024.

Line 248 the revenue requirement calculation incorporates that conversion factor. However, when calculating the Total Restating Adjustments and Restated Results of Operation, the revenue requirement formula relies on Line 246 at Column BB and BC, respectively reflecting a conversion factor of 0.754213 for all adjustments (including S-11.41). This appears to overstate Staff's revenue requirement for Rate Year 1 by \$1.6 million. Please confirm the correct conversion factor for Staff Adjustment S-11.41 and the resulting RY1 natural gas revenue requirement.

- c. In Company witness Free's rebuttal testimony (SEF-28T at 76:16-77:2), they identify a potential error in Staff's revised exhibits DPK-7r and DPK-8r. Free suggests that Staff utilizes the Electric O&M amount instead of the Gas O&M amount for Schedule 141DCARB. Free claims this results in an overstatement of Staff's proposed natural gas requirement by \$3.6 million over the course of the rate plan. Please confirm whether Staff agrees with the Company's assessment of this error or provide narrative explaining how Staff's calculation in the referenced exhibits for Schedule 141DCARB is correct.

*/s/ Bijan Hughes*  
BIJAN HUGHES  
Administrative Law Judge  
cc: All Parties

