

**EXH. KJB-31  
DOCKETS UE-170033/UG-170034  
2017 PSE GENERAL RATE CASE  
WITNESS: KATHERINE J. BARNARD**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-170033  
Docket UG-170034**

**FOURTEENTH EXHIBIT (NONCONFIDENTIAL) TO THE  
PREFILED REBUTTAL TESTIMONY OF**

**KATHERINE J. BARNARD**

**ON BEHALF OF PUGET SOUND ENERGY**

**AUGUST 9, 2017**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED: July 14, 2017  
DOCKETS: UE-170033/UG-170034  
REQUESTER: PSE

WITNESS: Thomas E. Schooley  
RESPONDER: Thomas E. Schooley  
TELEPHONE: (360) 664-1307

**REQUEST NO. 2:**

Please reference the Response Testimony of Mr. Thomas E. Schooley at page 21, lines 7 through 12 in which Mr. Schooley states that “[i]t does not appear that a bright line can be drawn to identify a threshold for deferrals” and that when a deferrable storm happens, “there will be little doubt about whether the event is truly catastrophic or not.” Please provide the specific criteria that Mr. Schooley is recommending the Commission adopt related to PSE’s ability to defer costs under his proposed method of defining a deferrable storm event. In the response, please indicate the process Mr. Schooley is recommending that the Commission require PSE to follow in order to establish that an event is deferrable and that it is allowed to begin deferring costs.

**RESPONSE:**

Staff recommends that the Commission rescind PSE’s authority for blanket deferral of storm damage expenses. PSE may follow the procedures for filing an accounting petition when it believes a catastrophic event has occurred. Mr. Schooley also recommends in his testimony, Exh. TES-1T at 25:1-8, that any deferred storm damage expenditures must begin amortization in the month when the repair work is completed.