EXH. SEF-18 DOCKETS UE-170033/UG-170034 2017 PSE GENERAL RATE CASE WITNESS: SUSAN E. FREE

## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

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

**PUGET SOUND ENERGY,** 

Respondent.

# SIXTH EXHIBIT (NONCONFIDENTIAL) TO THE PREFILED REBUTTAL TESTIMONY OF

SUSAN E. FREE

ON BEHALF OF PUGET SOUND ENERGY

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSE TO DATA REQUEST

DATE PREPARED: August 2, 2017

WITNESS: Melissa C. Cheesmand and

Betty A. Erdahl

DOCKETS: UE-170033/UG-170034

RESPONDER: Melissa C. Cheesman and

Betty A. Erdahl

TELEPHONE: (360) 664-1283

REQUESTER: PSE

#### **REQUEST NO. 27:**

The Response Testimony of Ms. Betty Erdahl, Exh. BAE-1T, advocates reducing electric rate base by \$35,650,297 and gas rate base by \$47,382.699 as a result of WUTC Staff's adjustment to working capital. In subpart (d) to WUTC Staff's Response to PSE Data Request No. 010, WUTC Staff states that a correction can be made to its proposed adjustment to rate base. Please calculate corrections to any affected exhibits and provide replacement files for the exhibits and supporting workpapers.

#### **RESPONSE:**

In order to expedite a response to PSE and the other parties, Staff is providing the following corrected work papers that remove Staff's reduction to electric rate base by \$35,650,297 and gas rate base by \$47,382.699:

170033-Staff-WP-MCC-2,3,4,5,6 Markup 170034-Staff-WP-MCC-7,8,9,10,11 Markup

All changes to the above Excel work papers have been highlighted in orange for easy recognition.

In order to avoid multiple revenue requirement models, the above Excel work papers also include corrections to Depreciation Study adjustment 13.06, as per Mr. McGuire's responses to PSE's Data Requests 17 and 21, and the re-categorization of the accounts in response to PSE Data Request 028 below.

Please see the following attached file for Mr. McGuire's corrected work paper:

170033-Staff-WP-CRM-Depr Study 13.06

The above revisions together change Staff's recommended revenue requirements from negative \$46 million to negative \$35 million for electric operations and from negative \$54 million to negative \$48 million for natural gas operations.

Exh. MCC-7 Dockets UE-170033/UG-170034 OVERALL REVENUE SUFFICIENCY CALCULATION

Do

PUGET SOUND ENERGY-GAS
RESULTS OF OPERATIONS
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016
GENERAL RATE INCREASE

Rate Decr (190,199) FINAL REVENUE REQUIREMENT SUFFICIENCY NEW 32,324,632 104,197 51,434,626 190,199 52,098,690 267,787 19,774,058 1,996,526 17,405,547 CURRENT OTHER SCHEDULE REVENUE (LESS) NEW S 7.37% 62.05% Rate Decr %0.0 0 7.37% (511,214,276) (1,360,298,498) (30,161,803)50,607,313 11,657,750 3,051,941 13,051,143 358,130,693 358,130,693 2,455,383 56,192,923 28,000,710 2,284,141 101,800,268 38.564.770 DECREASE AFTER RATE S REVENUE REQUIREMEN 149,492 DEFICIENCY 358,130,693 \$ (511,214,276) (30,161,803) 804,274,699 817,325,841 2,455,383 50,599,511 34,421,424 (1,360,298,498) 13,051,143 358,130,693 56,192,923 27,980,659 11,657,750 3,051,941 RESULTS OF OPERATIONS 1,284,141 101,800,268 38.564.776 ADJUSTED 69 31,737,324 \$ 1,895,506 (5,668,879) (12,460,807) 2,736,291 (9,058,658) (53,217,757) (24,929,000) (78,146,757) 31,737,324 (8,253)34,478 (20,280,517)(61,232,563) (27,288,647) 682,382 102,611 3,282,914 ADJUSTMENTS TOTAL 326,393,369 \$ 13,148,034 (502,155,618) (30,161,803) 1,649,679,153 77,640,607 %06.9 776,326,830 119,145,769 1,727,319,760 26,085,152 7,953,019 \$ 3,545,031,363 (1,363,034,789) (230,973)857,492,456 895,472,599 326,393,369 2,420,905 55,510,540 50,479,810 122,080,785 11,666,003 95,653,987 65,853,423 1,727,319,760 37,980,142 12,460,807 OPERATIONS RESULTS OF ACTUAL 69 ALLOWANCE FOR WORKING CAPITAL TOTAL RATE BASE TAXES OTHER THAN INCOME TAXES OPERATING REVENUE DEDUCTIONS: AMORTIZATION OF PROPERTY LOSS OTHER POWER SUPPLY EXPENSES TOTAL OPERATING REV. DEDUCT. ACCUMULATED DEPRECIATION ACCUMULATED DEFERRED FIT CUSTOMER ACCOUNT EXPENSES CUSTOMER SERVICE EXPENSES CONSERVATION AMORTIZATION TOTAL PRODUCTION EXPENSES MUNICIPAL ADDITIONS OTHER OPERATING REVENUES TOTAL OPERATING REVENUES OTHER OPERATING EXPENSES ADMIN & GENERAL EXPENSE UTILITY PLANT IN SERVICE DEFERRED INCOME TAXES TOTAL NET INVESTMENT TRANSMISSION EXPENSE NET OPERATING INCOME DISTRIBUTION EXPENSE OPERATING REVENUES: SALES TO CUSTOMERS Conversion Factor Revenue Requirement RATE OF RETURN PURCHASED GAS STAFF POSITION AMORTIZATION INCOME TAXES DEPRECIATION Rate of Return RATE BASE: GAS COSTS: RATE BASE 25 26 27 29 30 33 35 36 39 40 4 4 5 44 45 44 48 49 50 E

Exh. MCC-7 Dockets UE-170033/UG-170034 Page 2 of 28

PUGET SOUND ENERGY-GAS
STATEMENT OF OPERATURG INCOME AND ADJUSTIMENTS
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016
Adjustment Summany (Page 1)

					Adjustmen	Adjustment Summary (Page 1)		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
STAFF POSITION					CONTESTED			CONTESTED			
74.2		ACTUAL	×	REVENUE & TI	TEMPERATURE	PASS THROUGH	FEDERAL	TAX BENEFIT OF	DEPRE	DEPRECIATION IN	INJURIES &
E NO.	- 0	RESULTS OF OPERATIONS	щ	EXPENSES NO 11.01	NORMALIZATION 11.02	KEVENUE & EXPENSE 11.03	INCOME TAX 11.04	FRO FORMA INTEREST 11.05	TS 11	STUDY D	DAMAGES 11.07
1 OPERATING REVENUES. 2 SALES TO CUSTOMERS 3 MINICIPAL ADMITIONS	so	857,492,456	59	(54,715,829) \$	59,630,060	\$ (51,812,721)	59	5	s	59	,
		37,980,142		(24,316,522)	- 1	(612,478)					
5 TOTAL OPERATING REVENUES 6	<del>69</del>	895,472,599	69	(79,032,351) \$	59,630,060	\$ (52,425,199)		S	65	6 <del>5</del>	1
7 8 OPERATING REVENUE DEDUCTIONS:											
9 10 GAS COSTS: 11											
12 PURCHASED GAS	69	326,393,369	69	(25,171,488) \$	31,634,036	\$ 25,274,776	69	69	65	<del>69</del> 1	i
14 TOTAL PRODUCTION EXPENSES	69	326,393,369	64	(25,171,488) \$	31,634,036	\$ 25,274,776	€9	<b>∞</b>	59	<del>65</del>	
		2,420,905		S	٠		€4	69	69	<del>69</del> 1	ř
17 TRANSMISSION EXPENSE 18 DISTRIBUTION EXPENSE		55,510,540									
		26,085,152		(406,226)	306,499	(269,466)					
		12,460,807				(12,460,807)					
22 ADMIN & GENERAL EXPENSE 23 DEPRECIATION		50,479,810		(158,065)	119,260	(104,850)			5	(003 030 00)	88,827
		11,666,003							2	(8,253)	
25 AMORTIZATION OF PROPERTY LOSS 26 OTHER OPERATING EXPENSES		(230,973)			•						
		1 000		2000							
		95,653,987		(3,028,678) (17,593,763)	2,285,143 8,849,793	(60,303,751) 396,387		(18,196,137)	0	7,093,745	(31,089)
30 DEFERRED INCOME TAXES 31 TOTAL OPERATING REV. DEDUCT.	59	776,326,830	69	(46,358,219) \$	43,194,731	\$ (53,161,347)	(27,288,647) \$ (700,822)	(18.196.137	0 8	(13.174.098) \$	57.738
32 33 NET OPERATING INCOME	69	119,145,769	69					69			(57,738)
34 35 DATE BASE	9	1 727 318 760	6	ē		6	6	٥		ll .	
	7	00,000,000	9	•		÷	9	9	9	6, 740, 100,0	
37 RATE OF RETURN		6.90%									
R	19										
	64	3,545,031,363 (1,363,034,789)	64)	r 1	•	· •	€9			\$ 10,133,921	E 3
42 ACCUMULATED DEFERRED FIT 43 OTHER		(502,155,618) (30,161,803)							0	(3,546,872)	•
44 TOTAL NET INVESTMENT 45 ALLOWANCE FOR WORKING CAPIT	\$ AI.	1,649,679,153	69				69		55	6,587,049 \$	
46 TOTAL RATE BASE	<del>55</del>	1,727,319,760	89	\$	1	- \$	\$	\$	€9	6,587,049 \$	
49 Conversion Factor 50 Revenue Requirement	69	13,148,034	69	\$2,661,989 \$	(26,489,368) \$	\$ (1,186,474) \$	\$ (1,129,538)	8) \$ (29,327,322)	69	(20,450,692) \$	93,058

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PUGET SOUND ENERGY-GAS
STATEMENT OF OPERATING INCOME AND ADJUSTMENTS
FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016
Adjustment Summary (Page 2)

STAFF POSITION						CONTESTED	CONTESTED					
2		BAD	INCENTIVE	D&O	INTEREST ON	RATE CASE	DEFERRED GAINS/	PROPERTY&		PENSION	WAGE	INVESTMENT
E NO.		DEBTS 11.08	PAY 11.09	INSURANCE 11.10	DEPOSITS 11.11	EXPENSES 11.12	SALES 11.13	LIABILITY INS 11.14		PLAN II 11.15	INCREASE 11.16	PLAN 11.17
1 OPERATING REVENUES: 2 SALES TO CUSTOMERS 3 MUNICIPAL ADDITIONS 4 OTHER OPERATING REVENITES	59					. ∞		€9	<u>چ</u>	. ·		€9
	55	•	10	S	S	· ·	59	ss	<del>69</del>	69		· •
10 GAS COSTS: 11 12 PURCHASED GAS 13	€9	5				•		€9	<del>69</del> 1	<del>69</del> 1		· •>
14 TOTAL PRODUCTION EXPENSES	69	1	5	5	59	59	59	\$	59	59		S
16 OTHER POWER SUPPLY EXPENSES 17 TP ANSMISSION EXPENSE	59	1	(3,616)	59	55	· 65	· •s	59	59 1	\$	38,094	69
		(54,215)	(75,416) (29,562) (3,133)		50,137						- 757,798 101,412 27,891	
		Ţ	(39,008)	(17,901)		ı		·(69)	(69,499)	880,140	397,841	71,829
							68,223					
27 ASC 815 28 TAXES OTHER THAN INCOME TAXES 29 INCOME TAXES 30 INFERPRED INCOME TAXES		18,975	(9,300) 56,012	6,265		· •	(23,878)		24,325	(308,049)	72,979 (488,605)	(25,140)
31 TOTAL OPERATING REV. DEDUCT.	S	(35,240)	\$ (104,023)	\$ (11,636)	\$ 50,137	\$	\$ 44,345	69	(45,174) \$	\$72,091 \$	601,109	\$ 46,689
33 NET OPERATING INCOME		35,240	104,023	\$ 11,636	(50,137)	69	\$ (44,345)	89	45,174 \$	(572,091)	(907,409)	(46,689)
34 35 RATE BASE	S	1	59	s	•	· •	· •	69	69	•	1	€9
36 37 RATE OF RETURN												
MATE BASE:  40 UTILITY PLANT IN SERVICE  41 ACCUMULATED DEPRECIATION  42 ACCUMULATED PEFERRED FIT	€9	1	69	, sa	∞	€	€9	€9	<del>ss</del>	•	1	∽
Г	\$ 14	i	· · · · · · · · · · · · · · · · · · ·	69	ss.	69	59	<del>69</del>	69 1	59		€9
H	<sub>~</sub>	,	59	5	↔		5-5	69	€9	S	1	59
47 48 Rate of Return 49 Conversion Factor 50 Revenue Requirement	69	\$ (767,92)	\$ (167,657) \$	\$ (18,754) \$	\$ 80,807	· •	\$ 71,472	€5	(72,809) \$	922,058 \$	1,462,502	\$ 75,250

PUGET SOUND ENERGY-GAS	STATEMENT OF OPERATING INCOME AND ADJUSTMENTS	FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016	Adjustment Summary (Page 4)
PUGET SOUND ENERGY-GAS	STATEMENT OF OPERATING INCOME AND ADJUSTMENTS	FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016	Adiustment Summary (Page 4)

		į			Adjustment St	Adjustment Summary (Page 4)	REVISED				
STAFF POSITION		CON	CONTESTED	CONTESTED			CONTESTED NEW	CONTESTED NEW			
	EMPLOYEE		ENVIRONMENTAL	PAYMENT	SOUTH KING	WUTC FILING FEE	ISWC and RB	LEGAL COST	COST	TOTAL	ADJUSTED
NO.	INSURANCE 11.18		REMEDIATION 11.19	COSTS 11.20	CENTER 11.21	EXCISE TAX 11.22	ADJUSTMENT 11.23	ADJUSTMENT 11.24	RCVRY MECH 7.01	ADJUSTMENTS	RESULTS OF OPERATIONS
OPERATING REVENUES: SALES TO CUSTOMERS MUNICIPAL ADDITIONS OTHER OPERATING REVENUES	<del>50</del>					1			\$ (6,319,268)	\$ (53,217,757)	\$ 804,274,699
TOTAL OPERATING REVENUES	So	<del>55</del>			59	59	·		\$ (6,319,268)		\$ 817,325,841
OPERATING REVENUE DEDUCTIONS:											
9 10 GAS COSTS: 11											
PURCHASED GAS	<del>69</del>	·								\$ 31,737,324	\$ 358,130,693
14 TOTAL PRODUCTION EXPENSES	<del>54</del>	69	1		69	69	59	59	•	\$ 31,737,324	\$ 358,130,693
15 16 OTHER POWER SUPPLY EXPENSES 17 TP ANSWISSION EXPENSE	69	1								874,478	\$ 2,455,383
DISTRIBUTION EXPENSE DISTRIBUTION EXPENSE CUSTOMER ACCOUNT EXPENSES CUSTOMER SERVICE EXPENSES				2,229,410			¥		(32,481)	682,382 1,895,506 (5,668,879)	56,192,923 27,980,659 2,284,141
CONSERVATION AMORTIZATION ADMIN & GENERAL EXPENSE DEPRECIATION	90,433	133			(177,706)	(44,763)		(904,198)	(12,639)	(12,460,807) 119,701 (20,280,517)	50,599,511 101,800,268
AMORTIZATION AMORTIZATION OF PROPERTY LOSS										(8,253)	11,657,750
OTHER OPERATING EXPENSES ASC 815			3,214,691							3,282,914	3,051,941
TAXES OTHER THAN INCOME TAXES INCOME TAXES DEFERRED INCOME TAXES	(31,651)	551)	(1,125,142)	(780,294)	114,180	(6,790)		316,469	(242,167)	(61,232,563) 2,722,422	34,421,424 2,722,422 38,564,776
TOTAL OPERATING REV. DEDUCT.	\$ 58,781	781 \$	2,089,549	\$ 1,449,117	\$ (212,048)	\$ (33,509)	ss	\$ (587,729)	\$ (2,315,544)	S	168,198,689
NET OPERATING INCOME	\$ (58;	(58,781) \$	(2,089,549)	\$ (1,449,117)	\$ 212,048	\$ 33,509	•	\$ 587,729	\$ (4,003,724)	8,318,182	127,463,951
RATE BASE	s	<del>5</del>	(2,089,549)	69	\$ 7,775,116	· •>	\$ 3,733,635	· ·	\$ 19,011,708	\$ 35,017,959	\$ 1,762,337,719
RATE OF RETURN											7,23%
RATE BASE: UTILITY PLANT IN SERVICE ACCUMULATED DEPRECIATION ACCUMULATED DEFERRED FIT OTHER	<del>69</del>	s '	ī	· · · · · · · · · · · · · · · · · · ·	\$ 7,690,286 (49,520) 134,349				\$ 32,005,953 (7,348,110) (5,646,135)	\$ 39,696,239 2,736,291 (9,058,658)	\$ 3,584,727,602 (1,360,298,498) (511,214,276) (30,161,803)
TOTAL NET INVESTMENT ALLOWANCE FOR WORKING CAPITAL	es .	<del>59</del>	(2.089.549)	59	\$ 7,775,116	s	3.733.635		\$ 19,011,708	\$ 33,373,873	\$ 1,683,053,026
TOTAL RATE BASE	59	<del>69</del>	1 11	5	\$ 7,775,116	S		· ·	\$ 19,011,708	\$ 35,017,959	\$ 1,762,337,719
44) 48 Rate of Return 49 Conversion Factor 50 Revenue Requirement	\$	94,740 \$	3,119,590	\$ 2,335,590	\$ 581,800	\$ (54,008)	\$ 443,499 \$	\$ (947,262) \$	\$ 8,711,237	\$ (9.247,092) \$	\$,900,942

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Adj. 11.05

#### CONTESTED

# PUGET SOUND ENERGY-GAS TAX BENEFIT OF PRO FORMA INTEREST FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016 GENERAL RATE CASE

REVISED

LINE			
NO.	DESCRIPTION		AMOUNT
1	RATE BASE	\$ 1,762,337,719	
2			
3	NET RATE BASE	\$ 1,762,337,719	
4			
5	WEIGHTED AVERAGE COST OF DEBT	2.95%	
6	PROFORMA INTEREST		\$ 51,988,963
7			
8	INCREASE (DECREASE) INCOME		\$ (51,988,963)
9			
10	INCREASE (DECREASE) FIT @	35%	\$ (18,196,136.95)
11	INCREASE (DECREASE) NOI		\$ 18,196,137

Page 1 of 1

#### REVISED

Puget Sound Energy

### STAFF'S ADJUSTMENT TO INVESTOR SUPPLIED WORKING CAPITAL AND RATE BASE For the Twelve Months Ended September 30, 2016

Per Exh. BAE-3 ISWC PSE WP - "5.03 E&G RB - 5.04 E&G WC STAFF REVISED TOTAL AS ADJUSTMENT ADJUSTED BY STAFF 17GRC.xlsx" (b) (c) = (d) - (b)(d) STAFF LINE (a) AMA STAFF AMA **AMA** NO. Description AVERAGE INVESTED CAPITAL FOOTNOTE 7,389,220,147 7,389,220,147 Total Average Invested Capital 2 3 **INVESTMENTS** 6 Electric (Rate Base and Deferrals) 4,961,861,442 4,926,199,220 8 Total Electric (Rate Base and Deferrals) Gas (Rate Base and Deferrals) 10 11 1,649,679,153 (47,382,699)1,697,061,852 12 Total Gas (Rate Base and Deferrals) 13 6,658,923,294 6,575,878,373 Total Electric & Gas Investment (83,044,921) 14 15 16 17 Non-Operating 18 425,115,043 465,985,537 19 Total Non Operating Investment 40,870,494 (1) 20 7,041,863,910 21 7,084,038,337 **Total Average Investments** 22 305,181,810 \$ 42,174,427 \$ Total Investor Supplied Capital 23 24 25 INVESTED SUPPLIED WORKING CAPITAL 26 27 242,996,179 \$ 227,005,242 28 **Electric Working Capital** 69.96% 74.38% Electric Allocation (Line 28 / Line 23) 29 77,640,607 3,733,635 81,374,243 30 Gas Working Capital 25.44% Gas Allocation (Line 30 / Line 23) 31 22,985,815 535,961 Non Operating Working Capital 0.18% Non-Operating Allocation (Line 32 / Line 23) 33 34 Footnotes: (1) Non-Operating includes accounts that accrue or earn interest, CWIP, Non-utility, and or accounts not allowed for rate making purposes.

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# PUGET SOUND ENERGY-GAS GENERAL RATE INCREASE FOR THE TWELVE MONTHS ENDED SEPTEMBER 30, 2016 GENERAL RATE CASE

, H	OTHER REVENUE SCHEDULE* REQUIREMENT	REVENUE SUFFICIENCY										\$ 52,098,690 \$ (48,197,748)
@ 2011 REVENUE	REVENUE REQUIREMENT	DEFICIENCY	\$ 1,762,337,719	7.37%		\$ 129,884,290		\$ 127,463,951	\$ 2,420,339		0.620450	\$ 3,900,942 \$
	LINE	NO. DESCRIPTION	1 RATE BASE	2 RATE OF RETURN	3	4 OPERATING INCOME REQUIREMENT	25	6 PRO FORMA OPERATING INCOME	7 OPERATING INCOME SUFFICIENCY	8	9 CONVERSION FACTOR	10 REVENUE REQUIREMENT SUFFICIENCY