

**EXH. WFD-6
DOCKET UG-230393
WITNESS: WILLIAM F. DONAHUE**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

Docket UG-230393

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

WILLIAM F. DONAHUE

ON BEHALF OF PUGET SOUND ENERGY

OCTOBER 6, 2023

Comparison of Cost Allocation scenarios (after Functionalization) for Four Mile Pipeline Segment related to providing service to/from Tacoma LNG

Page	Description	functionalized (\$Million)	Peak Allocation %		Annual Volume (Dth)		Average Allocation%		PK/Ave Weight		Total Allocator		Peak Only				
			LNG for PSE Dist	PSE Dist for PLNG	LNG for PSE Dist	PSE Dist for PLNG	LNG for PSE Dist	PSE Dist for PLNG	PDAY	COM1	LNG for PSE Dist	PSE Dist for PLNG	LNG for PSE Dist	PSE Dist for PLNG	Total		
														CapEx Allocated for CIAC			
WFD-3	Allocation of Costs for CIAC Determination																
	4 mile 16" line (est. attributed as follows:)	Cap-Ex	Design	Design													
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 11.65	10.0%	90.0%							10.00%	90.00%	\$ 1.16	\$ 10.48	\$ 11.65		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 11.65	100.0%	0.0%							100.00%	0.00%	\$ 11.65	\$ -	\$ 11.65		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 4.11	100.0%	0.0%							100.00%	0.00%	\$ 4.11	\$ -	\$ 4.11		
		\$ 27.40											\$ 16.92	\$ 10.48	\$ 27.40		
																61.7%	38.3%

Page	Description	functionalized (\$Million)	Peak Allocation %		Annual Volume (Dth)		Average Allocation%		PK/Ave Weight		Total Allocator		Peak & Average				
			PSE Pk Shave	PLNG-RS-88T	PSE Pk Shave	PLNG-RS-88T	PSE Pk Shave	PLNG-RS-88T	PDAY	COM1	PSE Pk Shave	PLNG-RS-88T	PSE Pk Shave	PLNG-RS-88T	Total		
														Rev.Reqmt Allocated			
WFD-7	Allocation of Costs for Ratemaking- using Typical Volumes																
1	4 mile 16" line (est. attributed as follows:)	Rev.Rqmt	Design	Design	Typical	Typical											
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 1.24	10.0%	90.0%	625,991	4,450,854	12.33%	87.67%	66.98%	33.02%	10.77%	89.23%	\$ 0.13	\$ 1.11	\$ 1.24		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 1.24	100.0%	0.0%	467,867	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 1.24	\$ -	\$ 1.24		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 0.44	100.0%	0.0%	44,600	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 0.44	\$ -	\$ 0.44		
		\$ 2.92											\$ 1.81	\$ 1.11	\$ 2.92		
																62.1%	37.9%
2	Allocation of Costs for Ratemaking- using Typical PSE and Maximum PLNG Volumes																
	4 mile 16" line (est. attributed as follows:)	Rev.Rqmt	Design	Design	Typical	Max											
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 1.24	10.0%	90.0%	625,991	6,758,024	8.48%	91.52%	66.98%	33.02%	9.50%	90.50%	\$ 0.12	\$ 1.12	\$ 1.24		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 1.24	100.0%	0.0%	432,766	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 1.24	\$ -	\$ 1.24		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 0.44	100.0%	0.0%	44,600	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 0.44	\$ -	\$ 0.44		
		\$ 2.92											\$ 1.79	\$ 1.12	\$ 2.92		
																61.5%	38.5%
3	Allocation of Costs for Ratemaking- using Typical PSE and Minimal PLNG Volumes																
	4 mile 16" line (est. attributed as follows:)	Rev.Rqmt	Design	Design	Typical	Min											
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 1.24	10.0%	90.0%	625,991	3,606,921	14.79%	85.21%	66.98%	33.02%	11.58%	88.42%	\$ 0.14	\$ 1.10	\$ 1.24		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 1.24	100.0%	0.0%	432,766	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 1.24	\$ -	\$ 1.24		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 0.44	100.0%	0.0%	44,600	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 0.44	\$ -	\$ 0.44		
		\$ 2.92											\$ 1.82	\$ 1.10	\$ 2.92		
																62.4%	37.6%
4	Allocation of Costs for Ratemaking- using Minimal PSE and Maximum PLNG Volumes																
	4 mile 16" line (est. attributed as follows:)	Rev.Rqmt	Design	Design	Min	Max											
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 1.24	10.0%	90.0%	355,484	7,118,480	4.76%	95.24%	66.98%	33.02%	8.27%	91.73%	\$ 0.10	\$ 1.14	\$ 1.24		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 1.24	100.0%	0.0%	284,283	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 1.24	\$ -	\$ 1.24		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 0.44	100.0%	0.0%	1	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 0.44	\$ -	\$ 0.44		
		\$ 2.92											\$ 1.78	\$ 1.14	\$ 2.92		
																61.0%	39.0%
5	Allocation of Costs for Ratemaking- using Minimal PSE and Minimal PLNG Volumes																
	4 mile 16" line (est. attributed as follows:)	Rev.Rqmt	Design	Design	Min	Min											
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 1.24	10.0%	90.0%	355,484	3,606,921	8.97%	91.03%	66.98%	33.02%	9.66%	90.34%	\$ 0.12	\$ 1.12	\$ 1.24		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 1.24	100.0%	0.0%	337,707	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 1.24	\$ -	\$ 1.24		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 0.44	100.0%	0.0%	1	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 0.44	\$ -	\$ 0.44		
		\$ 2.92											\$ 1.80	\$ 1.12	\$ 2.92		
																61.6%	38.4%
6	Allocation of Costs for Ratemaking- using Maximum PSE and Minimal PLNG Volumes																
	4 mile 16" line (est. attributed as follows:)	Rev.Rqmt	Design	Design	Max	Min											
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 1.24	10.0%	90.0%	813,970	3,606,921	18.41%	81.59%	66.98%	33.02%	12.78%	87.22%	\$ 0.16	\$ 1.08	\$ 1.24		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 1.24	100.0%	0.0%	448,479	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 1.24	\$ -	\$ 1.24		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 0.44	100.0%	0.0%	267,600	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 0.44	\$ -	\$ 0.44		
		\$ 2.92											\$ 1.83	\$ 1.08	\$ 2.92		
																62.9%	37.1%
7	Allocation of Costs for Ratemaking- using Maximum Volumes																
	4 mile 16" line (est. attributed as follows:)	Rev.Rqmt	Design	Design	Max	Max											
	50% of 85% cost 12" pipe (21,400 TO plant)	\$ 1.24	10.0%	90.0%	813,970	6,545,123	11.06%	88.94%	66.98%	33.02%	10.35%	89.65%	\$ 0.13	\$ 1.11	\$ 1.24		
	50% of 85% cost 12" pipe (21,400 FROM plant)	\$ 1.24	100.0%	0.0%	403,778	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 1.24	\$ -	\$ 1.24		
	15% for upgrade to 16" (66,000 less 21,400 FROM plant)	\$ 0.44	100.0%	0.0%	267,600	-	100.00%	0.00%	66.98%	33.02%	100.00%	0.00%	\$ 0.44	\$ -	\$ 0.44		
		\$ 2.92											\$ 1.80	\$ 1.11	\$ 2.92		
																61.9%	38.1%

Summary of Seven Operating Volume Scenarios- using Peak/Average	PLNG %		PLNG \$	
	Minimum	37.1%		\$ 1.08
	Average	38.1%		\$ 1.11
Maximum	39.0%	\$ 1.14		
Rev.Rqmt Allocated to Rate Schedule 88T		38.3%	\$ 1.12	