

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Dockets UE-240004 & UG-240005 (*Consolidated*)

Washington Utilities & Transportation Commission v. Puget Sound Energy

**RESPONSE OF PUBLIC COUNSEL TO JOINT ENVIRONMENTAL
ADVOCATES (JEA)**

DATA REQUEST NO(S). 001 through 002

Request No: 002
Directed to: Public Counsel
Date Received: September 25, 2024
Date Produced: September 27, 2024
Prepared by: Robert L. Earle, Alea, LLC.
Witnesses: Robert L. Earle

JEA DATA REQUEST NO. 002 TO PUBLIC COUNSEL

RE: Robert L. Earle, Exh. RLE-4C, Page 4:

The witness states, “[N]on-normal distributions call for non-normal z-scores, or a direct calculation of percentiles as PSE actually did.”

Please provide the witness's suggested methodology for computing percentile values directly from allowance market data.

RESPONSE:

As discussed in my exhibit, RLE-3C at 1, PSE appropriately uses actual percentages from the actual allowance prices. It does this using the Excel functions percentile.inc and quartile.inc (see 230968-PSE-Exh-CTM-3C-04-25-24 (C).xlsx, tab Exh CTM-3C (23 Vtg Statistics), cells c26:29). This is one satisfactory method for computing percentile values directly from allowance market data.