

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

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DOCKET UG-230393

**CROSS-EXAMINATION EXHIBIT OF WILLIAM F. DONAHUE  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT WFD-\_\_X**

Puget Sound Energy's Response to Public Counsel Data Request No. 51

**October 31, 2023**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UG-230393  
Puget Sound Energy  
Tacoma LNG Tracker**

**PUBLIC COUNSEL DATA REQUEST NO. 051:**

**Re: Rebuttal Testimony of Ronald J. Roberts, Exh. RJR-11T at 34:4–11.**

- a. Suppose there was not ratepayer participation in the Tacoma LNG facility. How would Puget LNG deal with boil-off gas and what would be the cost? Please provide documentation for your answer.
- b. Is PSE receiving any compensation for disposing of Puget LNG's boil-off gas? If so, please describe including documentation of the amounts received by PSE.

**Response:**

Puget Sound Energy ("PSE") objects to Public Counsel Data Request No. 051 to the extent it calls for speculation, assumes facts not in evidence, is vague and ambiguous ("was not ratepayer participation"), and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving its objections, PSE responds as follows:

- a. PSE notes this is an unrealistic hypothetical because the dual-uses of serving as a peak-shaving resource and providing marine and other transportation fuel is an important aspect of the Tacoma LNG facility. Notwithstanding the erroneous premise of Public Counsel's hypothetical, an LNG plant operator must have arrangements with the connected pipeline to receive the daily boil-off gas and either (a) absorb the boil-off gas into its system and record it in an imbalance account for later resolution or (b) transport it to another location for delivery. PSE has not determined what cost or charge would be associated with accommodation of boil-off gas for the hypothetical LNG facility in Public Counsel Data Request No. 051 subpart (a).
- b. PSE does not receive compensation for receiving and using Puget LNG's boil-off gas and providing an equivalent volume of gas back to Puget LNG when liquefying.