

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 467****PUBLIC COUNSEL DATA REQUEST NO. 467:****Re: Rebuttal Testimony of Catherine Koch, Exh. CAK-4T at 6:4-5 (Rider Conditions).**

Ms. Koch recites the criteria for rider cost recovery that were referenced by Mr. Gorman and then states, “The Commission has not consistently followed the guidelines Mr. Gorman suggests.” Please identify by citation each of the prior Commission Orders, where Ms. Koch believes the Commission has:

- a. State with particularity the basis for Ms. Koch’s testimony including identifying instances in which the Commission followed or failed to follow specific criteria. In PSE’s response, please identify the criteria followed or not followed and provided any relevant docket numbers and/or citations.
- b. Explain whether Ms. Koch believes that the, “significant, volatile and beyond a utility’s control” criteria should receive any consideration by the Commission when piecemeal cost recovery is proposed by a utility through a rider?

Response:

- a. The Prefiled Rebuttal Testimony of Catherine A. Koch, CAK-4T, points to the Prefiled Rebuttal Testimony of Daniel A. Doyle, Exhibit DAD-7T, at pages 24-25. A recent instance where the Commission approved a new rider that Ms. Koch’s testimony did address is the Commission’s approval of the Gas Cost Recovery Mechanism, which the proposed Electric Cost Recovery Mechanism (“ECRM”) is tailored after.
- b. PSE’s objects to Public Counsel’s statement “piecemeal cost recovery” as inaccurate to the extent Public Counsel is referring to PSE’s proposed ECRM. PSE will defer to the Commission as to what criteria it should consider when a utility proposes cost recovery through a rider.