

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. 476

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**Re: Rebuttal Testimony of Katherine J. Barnard, Exhibit No. KJB-17T at 9:1-7
(Attrition Claims).**

Ms. Barnard claims “it is quite surprising” that Mr. Brosch advanced some “criticism that PSE did not propose a Multi-Year Rate Plan or develop a K-Factor or attrition adjustment in its direct case.” Please provide the following information:

- a. What is Ms. Barnard’s understanding of “found margins” in the context of decoupling that has been approved by the Commission?
- b. What is Ms. Barnard’s understanding of Mr. Brosch’s testimony at page 38, line 19 through page 39, line 3?

Response:

- a. Ms. Barnard does not testify to found margins, nor decoupling. Decoupling is addressed in the testimony of Mr. Piliaris. For example, please see the Prefiled Direct Testimony of Jon A. Piliaris, Exhibit JAP-1T, pages 106 through 147, and the Prefiled Rebuttal Testimony of Jon A. Piliaris, Exhibit JAP-46CT, at pages 3 through 27.
- b. Ms. Barnard’s understanding is that Mr. Brosch’s testimony reads as follows:

“The Company has not provided any justification for retaining customer growth revenues or the ‘found margins’ from new customers within any continuation of decoupling. It would be poor public policy to allow PSE to continue to employ RPC decoupling, keeping the found margins from serving new customers for the sole benefit of shareholders, simply in case the Company experiences earnings attrition in the future that has not been either claimed or proven in PSE’s evidence.”

Please see the Prefiled Rebuttal Testimony of Jon A. Piliaris, Exhibit JAP-46CT, page 23, line 5 through page 24, line 20, for a response to Mr. Brosch's "complete" decoupling proposal.