

PSE Tacoma LNG  
Docket UG-230393

Appendix A

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**PUBLIC COUNSEL DATA REQUEST NO. 030:**

REQUESTED BY: Robert Earle

**Re: Design Day Standard. Docket UG-230393, Direct Testimony of Ronald J. Roberts, Exh. RJR-1T at 14:8–15:2; and Docket UE-220066 and UG-220067, Direct Testimony of Ronald J. Roberts, Exh. RJR-30T at 6:3–12:12.**

- a. Docket UE-220066 and UG-220067, Testimony of Ronald J. Roberts, Exh. RJR-30T at 9, Figure 1.
  1. Please provide the data underlying Figure 1 in Excel format.
  2. Please provide all of the supporting data, analysis, and workpapers used to derive the “Normalized Observed Peak Demand.”
  3. Please provide a copy of PSE’s 2011 IRP along with supporting workpapers.
- b. Docket UE-220066 and UG-220067, Testimony of Ronald J. Roberts, Exh. RJR-30T at 7:14–17. Please provide a copy of PSE’s 2005 Least Cost Plan along with all supporting appendices and workpapers including calculations and data in Excel format.

**Response:**

- a. PSE objects to Public Counsel Data Request No. 030.a as overbroad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, and subject thereto, PSE responds to each subpart as follows:
  1. Attached as Attachment A to Puget Sound Energy’s (“PSE”) Response to Public Counsel Data Request No. 030, please find an MS Excel spreadsheet containing the data behind Figure 1 in the Prefiled Direct Testimony of Ronald J. Roberts in Support of the Multiparty Settlement for Tacoma LNG, Exh. RJR-30T in Docket UG-220067.
  2. Attached as Attachment B to PSE’s Response to Public Counsel Data Request No. 030, please find an MS Excel file containing supporting data and analysis to derive the “Normalized Observed Peak Demand” in Figure 1. In Figure 1, “Normalized Observed Peak Demand” refers to an estimate of what natural gas usage would have been if peak occurred during

system design temperature conditions. The natural gas system is designed to a temperature that occurs, on average, once every 50 years.

3. PSE's 2011 Integrated Resource Plan and supporting documentation has been published to PSE's external website which can be found at the following URL: <https://www.pse.com/en/IRP/Past-IRPs/2011-IRP>.
  
- b. PSE objects to Public Counsel Data Request No. 030.b as overbroad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding this objection, and subject thereto, PSE responds as follows. PSE's 2005 Least Cost Plan and supporting documentation has been published to PSE's external website which can be found at the following: <https://www.pse.com/en/IRP/Past-IRPs/2005-IRP>.