

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UE-121373
Puget Sound Energy, Inc.'s
Petition for Approval of a Power Purchase Agreement for
Acquisition of Coal Transition Power

NWEC DATA REQUEST NO. 010

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Please reconcile the statement at lines 9-10 on p. 38 of Exh. No. ___ (CB-1HCT) with Article 10 in Exhibit No. ___ (RG-3C). In so doing, please explain and/or define the terms used in CB-1HCT at the above-referenced page and line numbers.

Response:

The partial statement at lines 9-10 on page 38 of the Prefiled Direct Testimony of Chris Bevil, Exhibit No. ___ (CB-1HCT), and Article 10 of the Second Exhibit to the Prefiled Direct Testimony of Roger Garratt, Exhibit No. ___ (RG-3C) are unrelated.

The statement, "Existing resource with demonstrated reliable operating history avoids development risk and operational performance of new resources," at lines 8-10 on page 38 of Exhibit No. ___ (CB-1HCT) is a qualitative assessment of the reliable operating history and performance of the Centralia Transition Coal Facility ("CTCF"), which has been in operation since 1971, in contrast to the development, construction, and operating risks and uncertainty associated with building new greenfield generation resources. The CTCF has a long operating history that demonstrates it has been a reliable physical supply of power in the Pacific Northwest region. A new greenfield generation resource, however, does not have a known operating history. Moreover, new resources involve development and construction risk not associated with existing operating resources.

Article 10 in Exhibit No. ___ (RG-3C) is a provision in the Coal Transition PPA that provides for the parties to address potential future changes in law, and specifically, a new or revised emission or performance standard.