

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	
)	DOCKETS UE-190529 and
Complainant,)	UG-190530 (<i>consolidated</i>)
)	
v.)	
)	
PUGET SOUND ENERGY,)	
)	
Respondent.)	
_____)	
In the Matter of the Petition of)	
)	
PUGET SOUND ENERGY)	DOCKETS UE-190274 and
)	UG-190275 (<i>consolidated</i>)
For an Order Authorizing Deferral)	
Accounting and Ratemaking Treatment)	
for Short-life UT/Technology Investment.)	
_____)	

**EXHIBIT BGM-12
REVISIONS AND RESPONSES TO DATA REQUESTS**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

AWEC DATA REQUEST NO. 034:

Please provide the total unrecovered investment associated with Colstrip Unit 1 and 2 by FERC account as of September 30, 2019.

First Revised Response:

Refer to the table below for the expected unrecovered investment by FERC Account estimated as of the expected shutdown date for Colstrip Units 1 and 2 of December 31, 2019, by FERC Account. The estimate was prepared as of September 30, 2019.

The amount for E317 (Asset retirement costs for steam production plant) included in Puget Sound Energy's original response has been removed as this balance will be depreciated to a \$0 balance by December 31, 2019, to coincide with the expected retirement date of the Units.

FERC Account	Balance
E311 (Structures and improvements)	8,235,804
E312 (Boiler plant equipment)	78,239,858
E314 (Turbogenerator units)	32,303,324
E315 (Accessory electric equipment)	4,476,249
E316 (Miscellaneous power plant equipment)	1,318,294
E350 (Land and land rights)	420
E353 (Station equipment)	14,363
E354 (Towers and fixtures)	6,414
E355 (Poles and fixtures)	(13,260)
E356 (Overhead conductors and devices)	69,822
E392 (Transportation equipment)	196,721
E394 (Tools, shop and garage equipment)	289,576
E396 (Power operated equipment)	241,482
Total	125,379,067

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**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

AWEC DATA REQUEST NO. 038:

Please identify all rate base amounts for Colstrip Units 1 and 2 included in PSE's proposed revenue requirement by FERC account.

First Revised Response:

Please refer to Attachment A to Puget Sound Energy's ("PSE") First Revised Response to AWEC Data Request No. 038 for all rate base amounts for Colstrip Units 1 and 2 included in PSE's proposed revenue requirement. The Accumulated Deferred Income Tax as of December 31, 2018, is a liability balance and the balance in the attachment, which had been reflected as a positive amount in PSE's original response, has been changed to a negative amount to reflect that the balance represents a liability.

**ATTACHMENT A to PSE's First Revised
Response to
AWEC Data Request No. 038**

**Puget Sound Energy
Colstrip 1 and 2 Rate Base
Response to AWEC DR 38
End of Period December 31, 2018**

Plant	FERC Account	Gross Plant EOP Accum Depr EOP		Accum Deferred Income Tax EOP Dec-18	Net Treasury Grant RCW 80.84 EOP Dec-18
		Dec-18	Dec-18		
Colstrip 1	E310 STM Land	28,925.39	-		
Colstrip 1	E311 STM Str/Impv	9,353,913.08	(5,847,573.40)		
Colstrip 1	E312 STM Boiler	90,575,245.58	(48,492,648.30)		
Colstrip 1	E314 STM Turbogogen	28,793,522.69	(11,824,104.22)		
Colstrip 1	E315 STM Accessory	7,338,719.11	(4,894,336.01)		
Colstrip 1	E316 STM Misc	986,710.17	(449,013.27)		
Colstrip 1	E392 GEN Trans Equip	151,677.92	(61,404.85)		
Colstrip 1	E3940 GEN Tools	204,468.53	(55,816.57)		
Colstrip 1	E396 GEN Power-Op Equip	140,845.08	(34,007.74)		
Subtotal Colstrip 1		137,574,027.55	(71,658,904.36)		
Colstrip 2	E310 STM Land	28,925.39	-		
Colstrip 2	E311 STM Str/Impv	4,520,471.05	(1,331,200.95)		
Colstrip 2	E312 STM Boiler	89,782,678.33	(42,905,367.43)		
Colstrip 2	E314 STM Turbogogen	33,894,225.08	(14,500,075.14)		
Colstrip 2	E315 STM Accessory	4,085,300.70	(1,567,212.82)		
Colstrip 2	E316 STM Misc	1,117,146.62	(569,510.43)		
Colstrip 2	E392 GEN Trans Equip	151,677.93	(58,155.56)		
Colstrip 2	E3940 GEN Tools	190,851.64	(49,803.07)		
Colstrip 2	E396 GEN Power-Op Equip	140,844.29	(30,190.43)		
Subtotal Colstrip 2		133,912,121.03	(61,011,515.83)		
Colstrip 1-2 Com	E310 STM Land	948,317.19	-		
Colstrip 1-2 Com	E311 STM Str/Impv	30,924,398.90	(28,130,473.49)		
Colstrip 1-2 Com	E312 STM Boiler	6,036,236.27	(5,407,193.59)		
Colstrip 1-2 Com	E314 STM Turbogogen	3,813,725.50	(3,742,255.71)		
Colstrip 1-2 Com	E315 STM Accessory	2,272,860.64	(2,090,448.33)		
Colstrip 1-2 Com	E316 STM Misc	6,204,689.75	(5,645,799.56)		
Colstrip 1-2 Com	E35099 (GIF) Easement	3,623.76	(3,162.03)		
Colstrip 1-2 Com	E3539 (GIF) Sta Eq	1,231,130.94	(1,197,808.76)		
Colstrip 1-2 Com	E3549 (GIF) Twr/Fixt	88,576.95	(81,879.77)		
Colstrip 1-2 Com	E3559 (GIF) Poles	49,006.68	(61,601.83)		
Colstrip 1-2 Com	E3569 (GIF) O/H Cond	254,414.09	(181,458.27)		
Subtotal Colstrip 1-2 Com		51,826,980.67	(46,542,081.34)		
Total Colstrip 1,2, 1-2 Com		323,313,129.25	(179,212,501.53)	(32,154,133.26)	(81,963,000.09)
Colstrip 1-4 Com *	E316 STM Misc	251,533.56	(206,949.78)		
Colstrip 1-4 Com *	E3970 GEN CommEq	1,902,286.74	(909,137.23)		
Total Colstrip 1-4 Com *		2,153,820.30	(1,116,087.01)		

* The allocation of Colstrip 1-4 Common has not yet determined

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**Dockets UE-190529 & UG-190530
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AWEC DATA REQUEST NO. 049:

Reference PSE's response to AWEC Data Request 36: Has PSE included any interest or carrying charges in connection with the PTCs that have been monetized, but not yet returned to ratepayers? If yes, please identify the interest rate used and provide workpapers supporting the interest calculation. If no, please explain why PSE believes it is appropriate to exclude interest on the regulatory liability balance for monetized production tax credits.

First Revised Response:

As noted in Puget Sound Energy's ("PSE") original response to AWEC Data Request No. 049, PSE recorded carrying charges of \$298,800.85 as of September 30, 2019, in connection with monetized production tax credits ("PTCs") not yet returned to ratepayers. The interest rate used was the authorized rate of return after tax from Docket UE-180899 and grossed-up for federal tax (6.89% ÷ 79%, or 8.72%). Initially, PSE inadvertently excluded the Accumulated Deferred Income Taxes ("ADIT") associated with the Regulatory Liability for monetized PTCs, which should be included in the interest accrual calculation, and changes the interest accrual as of September 30, 2019 to \$236,052.67.

Attached as Attachment A to PSE's First Revised Response to AWEC Data Request No. 049, is an updated calculation of the carrying charges noted above, including the impact of ADIT.

**ATTACHMENT A to PSE's First Revised
Response to
AWEC Data Request No. 049**

Account	Balance
10800801	82,224,442
10800811	-
Total Monetized PTCs	82,224,442
<i>Less:</i>	
10800821	
10800851	
PTC Carrying Balance	82,224,442
ADIT Balance	17,267,133
Net Balance	64,957,309
Annual Rate	8.72%
Monthly Interest Accrual	472,105.34

(Note 1)

(Note 1) The first entry should recognize only a half month of interest as the PTC's were monetized mid-month. See tab 2 for further detail.

Date	Balance	8.72% Interest	Comments
9/30/2019	64,957,309	236,052.67	(Note 1)
10/31/2019	64,957,309	472,105.34	
11/30/2019	64,957,309	472,105.34	
12/31/2019	64,957,309	472,105.34	
2019 Total		<u>1,652,368.68</u>	

(Note 1)

The first entry should recognize only a half month of interest as the PTC's were monet

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AWEC DATA REQUEST NO. 051:

Reference PSE's response to AWEC Data Request 34: Please provide a description of the account titled E317 asset retirement costs for steam production plant and provide invoice level detail of all amounts capitalized to said account over the period January 1, 2018 through December 31, 2019.

Response:

In Puget Sound Energy's ("PSE") Response to AWEC Data Request No. 034, FERC Account E317 (Asset retirement costs for steam production plant) is utilized in compliance with Generally Accepted Accounting Principles, specifically Accounting Standards Codification 410, Asset Retirement and Environmental Obligations.

Refer to PSE's First Revised Response to AWEC Data Request No. 034, in which PSE has removed this balance from the unrecovered investment balance.