

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UG-230393
Puget Sound Energy
2023 Tacoma LNG Tracker**

BENCH REQUEST NO. 001:

William F. Donahue testifies that the Company has exclusive rights to send “boil-off gas” into the four-mile distribution pipeline when liquefaction is not occurring. Donahue, Exh. WFD-5T at 6:18-7:1. Donahue testifies that the volume of boil-off gas is far less than the maximum peak shaving volume, but this is a cost-causer that Staff and Public Counsel ignore. *Id.* at 7:2-4.

1. Please provide daily measurements of boil-off gas delivered from the Tacoma LNG Facility into the gas distribution system for the use of PSE’s core gas customers for the most recent twelve months available.
2. Please describe how the average daily amount of boil-off gas delivered from the Tacoma LNG Facility to PSE’s core gas customers during this same time period compares to the Facility’s maximum peak shaving volume.

Response:

1. Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Bench Request No. 001, please find the requested information. The tab “DAILY BOG BY MONTH” shows the boil-off gas (“BOG”) delivered into the PSE gas distribution system each day and the total deliveries of BOG for each month for the most recent twelve months available, which are November 2022 through October 2023. The BOG volumes represent the total BOG received into the gas system. Puget LNG’s share is recorded into an imbalance account, but because PSE is the only party authorized to put gas in the pipeline for delivery from Tacoma LNG, Puget LNG’s share of the BOG is used by PSE for its sales customers. And, because PLNG already bought and transported this gas, PSE credits this volume back in the imbalance account to PLNG. This arrangement is similar to PSE’s contracts with its other Transport customers who own their own gas.

The tab “DAILY VAPORIZER BY DAY USED” shows volumes of gas vaporized and delivered to the PSE gas distribution system in January and February 2023. As described in the Prefiled Direct Testimony of Ronald J. Roberts, Exh. RJR-1T at 40:11 – 41:11, and the errata filed October 31, 2023, the Tacoma LNG Facility was used to vaporize natural gas for delivery to the PSE distribution system in

late January and late February 2023 as part of PSE's cold-weather action plan and reliability testing and in late January and early February 2023 due to an unplanned outage on Enbridge's Westcoast T-South natural gas pipeline system in British Columbia, which can transport over 1.9 billion cubic feet (1.9 Bcf) of natural gas per day and connects production from northeastern British Columbia to downstream markets in British Columbia and the Pacific Northwest.

2. As shown in tab "DAILY BOG BY MONTH", BOG gas volumes delivered to the PSE distribution system vary between 0 and 1,597 Dth/day. The maximum daily peak shaving volume that can be injected into the PSE distribution system from the Tacoma LNG Facility is 66,000 Dth/day.

**ATTACHMENT A to PSE's Response to
Bench Request No. 001**