

**EXH. JJS-5
DOCKETS UE-190529/UG-190530
UE-190274/UG-190275
2019 PSE GENERAL RATE CASE
WITNESS: JOHN J. SPANOS**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**Docket UE-190529
Docket UG-190530 (*Consolidated*)**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For an Order Authorizing Deferral
Accounting and Ratemaking Treatment
for Short-life IT/Technology Investment**

**Docket UE-190274
Docket UG-190275 (*Consolidated*)**

**FIRST EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED REBUTTAL TESTIMONY OF**

JOHN J. SPANOS

ON BEHALF OF PUGET SOUND ENERGY

JANUARY 15, 2020

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Dockets UE-190529 and UG-190530 (*Consolidated*)

Washington Utilities & Transportation Commission v. Puget Sound Energy

**RESPONSE OF PUBLIC COUNSEL TO PUGET SOUND ENERGY (PSE)
DATA REQUESTS NO. 018**

Request No: 018
Directed to: Public Counsel
Date Received: December 9, 2019
Date Produced: December 18, 2019
Prepared by: Paul J. Alvarez
Witnesses: Paul J. Alvarez

PSE Data Request No. 018 to Public Counsel
(Response Testimony of Paul J. Alvarez, Exh. PJA-1T, at 25:6-8):

Is Mr. Alvarez aware of any case in which a commission denied the return of the costs of retired legacy meters? If so, please provide the docket number and jurisdictions of all such cases Mr. Alvarez is aware of.

RESPONSE

Mr. Alvarez is unaware of any case in which a commission denied the return of the costs of retired legacy meters. However, he is aware of two cases in which the large balance of undepreciated legacy metering costs figured into commission decisions to deny AMI deployment plans. As discussed in his testimony, the Massachusetts Department of Public Utilities rejected National Grid's AMI deployment plan (and the AMI deployment plans of other investor-owned utilities in Massachusetts) based in part on the large balance of undepreciated legacy metering costs (Order dated May 10, 2018 in dockets 15-120, 15-121, and 15-122/123 at page 121-122).¹

In addition, the Kentucky Public Service Commission, in an Order dated August 30, 2018 in KPSC 2018-00005, rejected an AMI deployment plan, describing the extensive remaining useful life of existing meters as a significant factor in its decision.²

¹ *Petition of Mass. Elec. Co. and Nantucket Elec. Co., Fitchburg Gas and Elec. Light Co., and NSTAR Elec. Co. and W. Mass. Elec. Co. for Approval by the Mass. Dep't of Pub. Utils. of Grid Modernization Plans*, Dockets D.P.U. 15-120; D.P.U. 15-121; D.P.U. 15-22/123, Order at 121-122 (May 10, 2010).

² *Electronic Joint Application of Louisville Gas and Elec. Co. and Ky. Utils. Co. for a Certificate of Pub. Convenience and Necessity for Full Deployment of Advance Metering Sys.*, Docket K.P.S.C. 2018-00005, Order at 8 (Aug. 30, 2018).