

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED:	November 14, 2012	WITNESS:	David C. Gomez
DOCKET:	UE-121373	RESPONDER:	David C. Gomez
REQUESTER:	Puget Sound Energy	TELEPHONE:	(360) 664-1240

PSE Data Request No. 017 to WUTC Staff:

Re: David C. Gomez, Exhibit No. ____ (DCG-1HCT), page 11, footnote 23.

Please describe and provide all documents, data, calculations, and analyses in support of the assertion that Exhibit No. ____ (RG-9) “used 31 days for every month”. Please identify each cell in which Exhibit No. ____ (RG-9) incorrectly uses 31 days for a month.

RESPONSE:

Staff has already included, along with its testimony, all workpapers supporting its prefiled testimony and exhibits. The specific workpaper file that was used to uncover the error was; Centralia 1st year impact, in the tab labeled “Centralia”. Staff used total MWh deliveries for the entire contract period and multiplied it by the levelized \$2.92 MWh equity adder in cell B22 of Exhibit No. ____ (RG-9).⁵ The resulting number was \$98,099,386. Staff then multiplied by one-million the amount in cell B15 of Exhibit No. ____ (RG-9). The result was \$86,224,923. When \$86,224,923 is divided by the 33,595,680 MWh delivered in the PPA, the resulting equity adder proposed by the Company should be \$2.57 MWh. Staff worked its way backwards in the worksheet in Exhibit No. ____ (RG-9) and identified the error in cell B17. The correct formula should be expressed as:

= - PMT (0, 133, B15); instead of

= B16/XNPV (B9, I27:I159, B27:B159).

Staff’s position remains unchanged from its original testimony in Exhibit No. ____ (DCG-1HCT). PSE’s proposed \$/MWh adder of \$2.92 is erroneous and results in \$11.9 million more equity return than what the Company intended to propose. Staff will issue an errata page to correct Exhibit No. ____ (DCG-1HCT), page 11, footnote 23.

⁵ Revised version filed with the Commission on September 19, 2012.