

**Exh. JES-5  
Docket UE-210795  
Witness: Jennifer E. Snyder**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of**

**PUGET SOUND ENERGY**

**Clean Energy Implementation Plan  
Pursuant to WAC 480-100-640**

**DOCKET UE-210795**

**EXHIBIT TO  
TESTIMONY OF**

**JENNIFER E. SNYDER**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE Response to UTC Staff Data Request No. 7*

**October 10, 2022**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UE-210795  
Puget Sound Energy  
PSE 2021 Clean Energy Implementation Plan**

**WUTC STAFF DATA Request No. 007:**

**Re: Data Disclosure and Ease of Accessibility**

- a. By including the three-part Appendix A, “AURORA Modeling Description,” “CEIP Input AURORA LTCE Inputs,” and “CEIP Output Portfolio Output Summary,” in its 12/17/21 and 2/1/22 Final CEIP filings, does PSE believe it has fulfilled the CEIP data disclosure and ease of accessibility requirements per [WAC 480-100-640\(3\)\(b\)](#), [WAC 480-100-640\(6\)\(f\)\(iii\)](#), and further elaborated in the [IRP and CEIP Adoption Order R-601](#) (paragraphs 172 – 184)?
1. If yes, please explain via an additional narrative or by referencing additional filed CEIP documents how stakeholders can effectively navigate these Excel workbooks, which lack a table of contents or master data index. Additionally, this Appendix A is in Excel format, yet it’s Staff’s understanding that PSE’s CEIP Portfolio is an AURORA model. If Staff’s understanding is correct, please explain what steps PSE has taken to make its AURORA files easily accessible.
  2. If no, please explain by referencing additional portions of the CEIP (i.e., report and/or supporting appendices) how PSE has fulfilled these CEIP data disclosure and ease of accessibility requirements.
- b. Staff references the draft CEIP Staff comments that former UTC Staff member Kyle Frankiewich sent via email to PSE representatives Kara Durbin and Brian Tyson on 11/15/2021, included as an attachments to this data request. How specifically did PSE address and incorporate Staff’s draft CEIP guidance regarding data organization and navigability (see pp. 7-8 of Staff’s draft CEIP comments) into the Company’s final CEIP? For example, Staff continue to observe much of the data comprising Appendix A in PSE’s final CEIP is hardcoded, which is a violation of [WAC 480-07-140\(6\)\(a\)](#). Additionally, Staff have been unable to locate any master file index as part of the Company’s final CEIP submission. Please explain where within PSE’s final CEIP submission these concerns are addressed or if the Company failed to act on this feedback.

**Response:**

- a. Puget Sound Energy (“PSE”) believes it has met these requirements with a combination of the Excel spreadsheets in Appendix A as indicated by Staff, as well as the Confidential AURORA models submitted and served to all parties in this proceeding. These work papers, which are provided in native format, can be used together to navigate the inputs and outputs of the model. The inputs in

Appendix A should mirror the inputs in the AURORA model, and the same for the outputs. As shown in the redacted documents filed in this proceeding, some of the information in the AURORA model is confidential and PSE followed the appropriate steps to designate and submit the confidential model to the docket. PSE also provides a step-by-step guide on how to access the AURORA model in its Response to WUTC Data Request 005 and 006. Furthermore, PSE believes it has met the requirements in other files provided in the CEIP. For example, Appendix E for incremental cost calculation, uses embedded formulas and data from the AURORA model output to calculate the incremental cost.

While PSE believes it has met the requirements of WAC 480-100-640 and the expectations communicated in the IRP CEIP Adoption Order R-601 concerning data availability and accessibility requirements, PSE agrees that including a table of contents, a master file index, or both, would be helpful additions for the 2023 Biennial CEIP and future CEIPs.

- b. PSE incorporated staff's guidance into its final CEIP in the following ways:
  - i. PSE added active links throughout the final CEIP document to directly guide readers to specific Appendices.
  - ii. PSE made improvements in the Appendix A outputs by adding the breakdown of the calculation in the tables and figures in Chapter 2 into Appendix A-3, Tab 'ChartData CETA Interim Targets' to give staff insight into how the output from AURORA was used to calculate the interim target.
  - iii. PSE submitted an Excel version of Appendix L, Appendix E and Appendix F.
  - iv. PSE provided the confidential AURORA model files as part of the Final CEIP filing, which were not in the Draft CEIP filing.

PSE focused its attention on the requirements in WAC 480-100-640 in preparing its filing. Any hardcoding remaining in the spreadsheets is an oversight and was unintentional.

PSE acknowledges that it was not able to incorporate all of the recommendations made by Staff to improve data organization and navigability between receiving Staff's email on November 15, 2021 and submitting its final CEIP on December 17, 2021. If PSE had not made several substantive changes between the draft and final CEIP in response to stakeholder feedback, it would have been more manageable for PSE to focus its remaining time before the filing deadline on edits to improve the navigability and readability of the document. PSE agrees that providing a master file index would be a helpful improvement for the 2023 Biennial CEIP Update and future CEIP filings.