

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION****Dockets UE-190529 & UG-190530  
Puget Sound Energy  
2019 General Rate Case****PUBLIC COUNSEL DATA REQUEST NO. 269:**

Please refer to Catherine A. Koch's Rebuttal Testimony, Exh. CAK-6T at 12:5-8, regarding the reclassification of legacy assets for which asset value has not been recovered as regulatory assets.

- a) Does Ms. Koch assume that the reclassification of legacy assets as regulatory assets results in a failure of PSE to collect carrying costs on regulatory assets from customers?
- b) Is PSE willing to forego the collection of carrying costs on legacy AMR assets which are reclassified as regulatory assets when replaced with AMI assets?

**Response:**

Puget Sound Energy ("PSE") provides the following response to Public Counsel Data Request No. 269.

- a) No. The Commission has historically granted PSE a return on regulatory assets that were established to recover the balance of under-depreciated assets. Refer to Exh. SEF-26, specifically Regulatory Assets included for Rate Making. Included within this is Regulatory Assets Previously Approved which contains both the regulatory assets related to the loss created by the retirement of the Electron and White River assets, approved in Dockets UE-141141 and UE-170033, respectively. These regulatory assets were included in PSE's rate base.
- b) No, PSE believes it should be allowed recovery of these costs incurred to serve customers as it has been historically allowed to do as demonstrated by the examples provided in subpart a).