

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET NOS. UE-190529 and UG-190530 (*Consolidated*)

GLENN A. WATKINS ON BEHALF OF PUBLIC COUNSEL UNIT

EXHIBIT GAW-12

PSE Responses to Public Counsel Data Request Nos. 157, 162, 163, 164, 168, 170, and 172

November 22, 2019

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 157:

Please refer to *WUTC v. Puget Sound Energy*, Dockets UE-170033 & 170034, Supplemental Direct Testimony of Jon A. Piliaris, Exh. JAP-34T at 7, Figure 1.

Please provide an update of the current long-run avoided costs for residential electric service similar to the analysis that was provided in the supplemental direct testimony of Jon A. Piliaris, Exhibit JAP-34T in the Company's 2017 general rate case (Docket No. UE-170033 and UG-170034). Specifically refer to page 7, Figure 1 of that testimony.

Response:

Please see Attachment A to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 157 for an MS Excel spreadsheet updating the current long-run avoided costs for residential electric service similar to the analysis that was provided in the Supplemental Prefiled Direct Testimony of Jon A. Piliaris, Exh. JAP-34T, in PSE's 2017 general rate case (Dockets UE-170033 and UG-170034), at page 7, Figure 1.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 162:

For the test year as well as for each of the two preceding 12-month periods, please provide class hourly loads (by rate schedule) for each hour of each year.

- a) In this response, please provide each 12-month period in a separate file and provide in executable electronic format (Excel preferred).
- b) If data is not available in Excel format, please provide in ASCII comma-delimited with all fields defined.
- c) In this response, indicate if class loads are measured at meter or at generation level.
- d) If at meter, please also provide loss factors from generation to meter by rate schedule.

Response:

Attached as Attachments A and B to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 162 are two separate MS Excel files providing class hourly load estimates for: (1) the test year ending December 31, 2018; and (2) the test year ending September 30, 2016. PSE did not estimate twelve-month class hourly loads in the period from October 1, 2016 to December 31, 2017. These class hourly loads are at the generation level (i.e., including line losses).

Please note that the class "SL" represents Street Lighting customers served under PSE's electric rate Schedules 03, 50-54 and 57. The class "AL" represents Area Lighting customers served under PSE's electric rate Schedules 55, 56, 58 and 59.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 163:

For the test year as well as for each of the two preceding 12-month periods, please provide:

- a) net generation output (by unit) for each hour;
- b) net purchased power (MWH) for each hour; and,
- c) wholesale (non-jurisdictional) MWH sales for each hour.

In this response, please provide each 12-month period in a separate file and provide in executable electronic format (Excel preferred). If data is not available in Excel format, please provide in ASCII comma-delimited with all fields defined.

In this response, indicate if purchased power is at transmission voltage, sub-transmission voltage, etc.

With regard to wholesale sales, please indicate the voltage level the provided data reflects.

Response:

Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 163, please find a spreadsheet containing a) hourly generation output (MWh), b) hourly delivered purchased power, and c) hourly delivered wholesale sales for January 2016 – December 2016. Data is at transmission voltage.

Attached as Attachment B to PSE's Response to Public Counsel Data Request No. 163, please find a spreadsheet containing a) hourly generation output (MWh), b) hourly delivered purchased power, and c) hourly delivered wholesale sales for January 2017 – December 2017. Data is at transmission voltage.

Attached as Attachment C to PSE's Response to Public Counsel Data Request No. 163, please find a spreadsheet containing a) hourly generation output (MWh), b) hourly delivered purchased power, and c) hourly delivered wholesale sales for January 2018 – December 2018. Data is at transmission voltage.

Shaded information is designated as CONFIDENTIAL per Protective Order in WUTC Dockets UE-190529 and UG-190530 as marked in Attachments A, B, and C to PSE's Response to Public Counsel Data Request No. 163.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 164:

Please provide energy and demand loss factors by level of service from generation to secondary distribution. If seasonal factors are calculated or utilized, please provide on a seasonal basis.

Response:

Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 164 is an MS Excel spreadsheet providing average line loss factor by rate class for the test year ending December 31, 2018. Please note that the class "SL" represents Street Lighting customers served under PSE's electric rate Schedules 03, 50-54 and 57. The class "AL" represents Area Lighting customers served under PSE's electric rate Schedules 55, 56, 58 and 59.

Attachment A also shows the voltage level of service associated with each rate class. The average line loss factor estimates were reconciled to the annual system average line loss factor and were intended to be used as estimates for both energy and demand line loss.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 168:

For each generating unit owned individually or partially, please provide the following for the test year or most recent 12-months available:

- a) names of owners (and ownership percentages);
- b) type of fuel(s);
- c) total nameplate (rated) capacity (MW);
- d) total, or company-owned gross investment at the end of the period (indicate if total or company-owned amount);
- e) total, or company-owned depreciation reserve at the end of the period (indicate if total or company-owned amount);
- f) total, or company-owned annual book depreciation expense (indicate if total or company-owned amount);
- g) gross KWH produced during the period (indicate if total or company-owned amount); and,
- h) net (less station use) KWH produced during the period (indicate if total or company-owned amount).

Please provide in hardcopy as well as in executable Excel format.

Response:

Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 168, please find an MS Excel workbook containing the requested information for test year, January 1 through December 31, 2018.

Shaded information is designated as CONFIDENTIAL per Protective Order in WUTC Dockets UE-190529 and UG-190530 as marked in Attachment A to PSE's Response to Public Counsel Data Request No. 168.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 170:

For the test year as well as for each of the two preceding 12-month periods, please provide average monthly fuel costs per KWH by generating unit. If monthly amounts are not available, please provide on an annual basis. Please provide in executable electronic Excel format (as available).

Response:

Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Public Counsel Data Request No. 170, please find a spreadsheet containing annual fuel costs (\$/kWh) by generating resource for the test year (January 2018 – December 2018) and the two preceding 12-month periods.

Shaded information is designated as CONFIDENTIAL per Protective Order in WUTC Dockets UE-190529 and UG-190530 as marked in Attachment A to PSE's Response to Public Counsel Data Request No. 170.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 172:

For each curtailment during the last three years, please provide a listing of each curtailment showing:

- a) date and duration of curtailment; and,
- b) amount of load curtailed by rate schedule.

Response:

Puget Sound Energy has not curtailed electric customers due to inadequate energy supply during the last three years.