

**Exhibit No. ECO-22  
Dockets UE-151871/UG-151872  
Witness: Elizabeth C. O'Connell**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**DOCKETS UE-151871/UG-151872  
(consolidated)**

**EXHIBIT TO  
TESTIMONY OF**

**ELIZABETH C. O'CONNELL**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE response to Staff Data Request 48*

**June 7, 2016**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-151871 UG-151872  
Puget Sound Energy's  
Electric and Natural Gas Equipment Lease Service**

**WUTC STAFF DATA REQUEST NO. 048**

**WUTC STAFF DATA REQUEST NO. 048:**

Referring to Schedule 75, please provide, with calculations and formulas intact, the minimum lease payments as defined by Financial Accounting Standards Board Accounting Standards Update for Leases (Topic 842) No. 2016-02 issued in February 2016 for each one of the appliances (equipment) proposed in the tariff. Please sort information by customer class.

**Response:**

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 048 as unduly burdensome as it seeks information already in the possession of, obtainable by, or otherwise available to WUTC Staff. Without waiving such objections, and subject thereto, PSE responds as follows:

PSE does not believe that Financial Accounting Standards Board Accounting Standards Update for Leases (Topic 842) is applicable to leased assets proposed to be leased under PSE's Schedule 75 Tariff because PSE will follow General Instructions 19 "Criteria for classifying leases" and 20 "Accounting for leases" of the Uniform System of Accounts in Title 18, Chapter I, Subchapter F, Parts 101 and 201 in the Code of Federal Regulations ("CFR") for regulatory reporting.

The term minimum lease payment is not specifically defined in the CFR. The minimum lease payments is defined by Financial Accounting Standards Board Accounting Standards Update for Leases (Topic 842) No. 2016-02 issued in February 2016, as the "The minimum rental payments called for by the lease over the lease term".

This aligns with the "Total Lease Payment over Lease Term" amount detailed in cell C90 on tabs titled "32(HC)", "33(HC)", "34(HC)", "35(HC)", "36(HC)", "38(HC)", "39(HC)", "40(HC)", "41(HC)", "42(HC)", "44(HC)", and "45(HC)" of the highly confidential lease pricing worksheet that PSE provided on February 19, 2016.