



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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February 19, 2020

NOTICE OF BENCH REQUEST
(Due by Monday, March 2, 2020, at 5 p.m.)

Re: *Washington Utilities and Transportation Commission v. Puget Sound Energy*,
Dockets UE-190529, UG-190530, UE-190991, UG-190992, UE-190274, UG-
190275, UE-171225, and UG-171226 (*consolidated*)

TO PUGET SOUND ENERGY (PSE):

BENCH REQUEST No. 11:

Instructions for Bench Request No. 11 – Provide PSE’s response using a format consistent with rebuttal exhibit Excel files “190529-30-274-75-PSE-Free-Exh-SEF-18-21E-01-15-20” and “190529-30-274-75-PSE-Free-Exh-SEF-18-20G-01-15-20” but incorporating PSE’s response to Bench Request No. 1(A) for revenue requirement and net revenue change requested based on 9.5 ROE. Regarding PSE’s responses to (A), (B), and (C) below for both electric and natural gas, ensure that all exhibits and supporting calculations are linked to the respective revenue requirement models. PSE must provide one Excel workbook for electric and one Excel workbook for natural gas operations. Please file all responses pursuant to WAC 480-04-140(6)(a)(ii).

- A. Please update the electric and natural gas revenue requirement exhibits, including net revenue change requested, for the changes itemized below. Please also provide supporting exhibits or work papers if the revenue requirement exhibits provide a reference to those exhibits or work papers. Additionally, please highlight only those cells that require manual adjustments, but do not highlight those cells that changed based on formulas flowing from the manual adjustments.
 - i. The rebuttal testimony of Susan E. Free, Exh. SEF-17T discusses PSE’s intent to update its revenue requirement through its compliance filing. Please update the revenue requirement models to reflect the following items:

1. PSE's cost of short-term debt as of the date of this Bench Request.
 2. PSE's adoption of Staff's recommended Revenue and Expense Adjustment 20.01 GR and 20.01 EP.
 3. PSE's adoption of Staff's recommended Temperature Normalization Adjustment 20.02 ER, 20.02 EP, 20.02 GR, and 20.02 GP.
- ii. Additionally, please provide updates for the following pro forma capital addition adjustments through December 31, 2019, for only amounts used and useful, and known and measurable, consistent with Commission past practice. Do not include forecasts or estimates.
1. AMI Adjustment No. 20.22 EP and 20.22 GP (include all supporting calculations).
 2. GTZ Adjustment No. 20.24 EP and 20.24 GP (include all supporting calculations).
 3. Public Improvement Adjustment No. 20.27 EP and 20.27 GP (include all supporting calculations).
 4. HR Tops Adjustment No. 20.29 EP and 20.29 GP (include all supporting calculations).
 5. High Molecular Weight Cable Replacement Adjustment No. 21.09 EP (include all supporting calculations).
 6. Energy Management System Adjustment No. 21.10 EP (include all supporting calculations).
- iii. Update ISWC included in EOP adjustment No. 20.18 ER and 20.18 GR to reflect EOP treatment consistent with the rest of rate base.
- B. The rebuttal testimony of Susan E. Free in Exh. SEF-20E at 3 and SEF-20G at 3 does not provide sufficient detail to understand or verify PSE's testimony regarding the inclusion of protected-plus EDIT in the proposed FIT adjustments 20.03 ER and GR. Please provide supporting work papers for PSE's FIT adjustments with a narrative describing precisely how EDIT is included in these adjustments, all cell locations where EDIT is included, and what specific amounts of protected-plus EDIT are included in each cell. Please provide responses for both electric and natural gas revenue requirement calculations.
- C. Susan E. Free's exhibits Exh. SEF-20E at 26 and SEF-20G at 26 do not provide sufficient supporting calculations to verify PSE's position regarding the amortization of unprotected EDIT in PSE's proposed adjustments 20.26 EP and GP. Please provide supporting calculations for these adjustments with a narrative describing precisely how EDIT is included in these adjustments for both electric and natural gas revenue requirement calculations.

BENCH REQUEST No. 12:

- A. At hearing, PSE stated that there are GTZ and AMI expenses, including depreciation, in the test year. PSE will be providing the itemized expenses for GTZ and AMI included in the test year in response to Bench Request 3. Please provide the following additional information related to test year GTZ and AMI expenses:
- i. Does test year depreciation for GTZ (1) include depreciation expense for assets placed into service prior to the current general rate case test year, and (2) also relate to assets where depreciation is being deferred in Dockets UE-190274 and UG-190275?
 1. If yes to subpart i, please provide the GTZ depreciation test year amounts.
 2. Please provide the deferral depreciation balances for GTZ in Dockets UE-190274 and UG-190275 as of December 31, 2019.
 - ii. Does test year depreciation for AMI (1) include depreciation expense for assets placed into service prior to the current general rate case test year, and (2) also relate to assets where depreciation is being deferred from the Settlement in Dockets UE-180899 and UG-180900?
 1. If yes to subpart ii, please provide the AMI depreciation test year amounts.
 2. Please provide the deferral depreciation balances for AMI as of December 31, 2019, as authorized in Dockets UE-180899 and UG-180900.

BENCH REQUEST No. 13:

- A. Please provide the protected-plus EDIT amounts refunded to customers through Schedule 141X. This amount should reflect all amounts refunded to customers through Schedule 141X from March 1, 2019, through December 31, 2019.
- i. As a subset to Bench Request No. 13 (A) provide the estimated amounts to refund to customers through Schedule 141X from January 1, 2020, through May 19, 2020.
- B. Please provide the protected-plus ARAM reversals for the following periods:
- i. 2019 (before and after gross-up)
 - ii. 2020 (before and after gross-up)
- C. Please confirm or correct that the protected-plus ARAM reversals for 2018 were:
- i. Before gross-up, \$19.5 million for electric and \$4.6 million for natural gas.

- ii. After gross-up, \$25.9 million for electric and \$6.1 million for natural gas.

BENCH REQUEST No. 14:

- A. Confirm that Colstrip Units 1 and 2 depreciation is included in the current general rate case test year. If not, please provide the adjustment and cell location in exhibits that removes Colstrip Units 1 and 2 from the test year.
- B. Please provide the undepreciated plant balances for each Colstrip unit separately as of September 30, 2017, and as of December 31, 2019.
 - a. Please identify the amount transferred to a regulatory asset account for Colstrip Units 1 and 2, if that transaction has occurred.
- C. Identify the account and balance of monetized PTCs as of December 31, 2019, and indicate if that balance contains the \$5 million reserved for the Colstrip Community Fund.
- D. Provide the estimated amount of PTCs as of December 31, 2019, that have yet to be monetized.
- E. Identify the account and balance of Treasury Grants available to offset decommissioning and remediation costs associated with Colstrip Units 1 and 2.
- F. Provide the most recent estimates for PSE's share of decommissioning and remediation costs for each Colstrip unit stated separately.
- G. Please provide the amount of decommissioning and remediation costs currently embedded in rates for each Colstrip unit separately on an annualized basis, if any.
- H. Please provide the account and total balance of decommissioning and remediation costs recovered through rates for each Colstrip unit separately as of December 31, 2019.

Please respond to these Bench Requests no later than **5 p.m. on Monday, March 2, 2020**, by electronic filing with the Commission's Records Center. Please provide a courtesy copy by email to Administrative Law Judge Rayne Pearson at rayne.pearson@utc.wa.gov. If you have any questions concerning these requests, please contact Judge Pearson at 360-664-1136 or via e-mail.

/s/ Rayne Pearson
RAYNE PEARSON
Administrative Law Judge

Cc: All Parties