BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket UE-161123 Puget Sound Energy's Schedule No. 451 Large Customer Retail Wheeling

PUBLIC COUNSEL DATA REQUEST NO. 051

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RE: Electric Tariff G, Schedule No. 451, Large Customer Retail Wheeling, Section 1(2) "Eligibility for Service".

- a. In Section 1(2) "Eligibility for Service", the Schedule includes "newly acquired facilities" by a current Schedule 451 customer or its affiliates as eligible for service.
 - i. Would these facilities be responsible for paying stranded costs as described in Section 11 of Schedule 451?
 - 1. If so, describe the process for determining these costs.
 - 2. If not, please explain why these facilities would not be responsible for paying these costs.

Response:

Although it may be theoretically appropriate to apply a stranded cost to subsequentlyacquired Locations that begin taking service under Schedule 451, it would be difficult to administer in practice without an established formula for making this determination. As currently proposed, Puget Sound Energy ("PSE") does not anticipate that this situation will arise frequently enough or that the stranded costs will be so great that it would justify the added complexity required to address these infrequent occurrences, or other potential ways in which a customer as large as Microsoft may move, expand or contract its occupancy within locations currently served around PSE's service area.