

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

WUTC STAFF DATA REQUEST NO. 009

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Re: Eligibility

In his Exhibit No. ____ (JAP-1CT), Page 3, Lines 12-14, Mr. Piliaris states that "Microsoft also takes fully bundled service under several other rate schedules and those loads would not be eligible for Schedule 451."

- a. Please identify and list by individual location all Microsoft loads not eligible for Schedule 451. Provide actual loads by month, by location, for the last three years along with the monthly forecast that PSE will use in its upcoming rate case for these same loads and locations.¹ For each individual Microsoft non-Schedule 451 location, identify the applicable tariff schedule or schedules that PSE uses to calculate Microsoft's bill. Please also explain why these loads (either individually or collectively) are not eligible for Schedule 451.
- b. Please identify and list by individual location all Microsoft loads eligible for Schedule 451.² Provide actual loads by month, by location, for the last three years along with the monthly forecast that PSE will use in its upcoming rate case for these same loads and locations. Please confirm that the amount of Microsoft's load (MWh) Mr. Piliaris states in his pre-filed testimony, Exhibit No. ____ (JAP-1CT), 3:11, as eligible for Schedule 451 is in error.
- c. Please identify and list by individual customer, and by each individual customer location, all remaining Schedule 40 loads. Provide actual loads by month, by customer location, for the last three years along with the monthly forecast that PSE will use in its upcoming rate case for these same loads and locations. From the resulting list, identify all customers and loads that would be eligible for Schedule 451 service.
- d. Please identify and list by individual customer, and by each individual customer location, those customers who have maintained a minimum of 10 aMW at one or more of their locations but who are not taking service under Schedule 40. Provide actual loads by month and by customer location for the last three years along with the monthly forecast that PSE will use in its upcoming rate case for

¹ PSE is expected to file its next general rate case in mid-January 2017.

² Piliaris, Exhibit No. ____ (JAP-1CT), Page 3:8-11.

- these same loads and locations. Also, list the Tariff Schedule or Schedules under which these customers are currently receiving service from PSE.
- e. For the years 2011-2015, please provide an annual summary by Tariff Schedule of all of PSE's forecasted non-core electric customer loads. For these same years, provide an annual summary by Tariff Schedule of the actual non-core electric customer loads for these same loads. Summarize and explain the differences between forecasted and actual non-core customer load.
 - f. For each of the years 2011-2015, please list annual loads greater than 5 aMW that ceased service during the year by customer name. Please provide the date the customer ceased service along with the amount of departing load of that same customer. Also, please provide the individual reason given by each departing customer for ceasing electric service.

Any responsive materials provided in Excel format should be fully functional with all workbooks, worksheets, data and formulae left intact.

Response:

- a. Attached as Attachment A to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 009 is an MS Excel spreadsheet containing a list of individual locations of all Microsoft loads not eligible for Schedule 451 with actual loads by month, by location and applicable tariff schedule for the last three years. PSE does not forecast loads at the customer-specific level requested. However, PSE notes the loads for these locations that will be used in its upcoming rate case are the test year loads billed in the twelve months of October 2015 through September 2016. Please see pages 2-11 in the Prefiled Supplemental Direct Testimony of Jon A. Piliaris, Exhibit No. ___(JAP-6T) for further explanation for the eligibility requirements for service under Schedule 451.
- b. Attached as Attachment B to PSE's Response to WUTC Staff Data Request No. 009 is an MS Excel spreadsheet containing a list of individual locations of all Microsoft loads eligible for Schedule 451 with actual loads by month, by location and applicable tariff schedule for the last three years. PSE does not forecast loads at the customer-specific level requested. However, PSE notes the loads for these locations that will be used in its upcoming rate case are the test year loads billed in the twelve months of October 2015 through September 2016. As shown in Attachment B to PSE's Response to WUTC Staff Data Request No. 009, PSE confirms that the amount of Microsoft's load (MWh) Mr. Piliaris states at page 3, line 11, to the Prefiled Direct Testimony of Jon A. Piliaris, Exhibit No. ___(JAP-1CT), as eligible for Schedule 451 is correct.
- c. Attached as Attachment C to PSE's Response to WUTC Staff Data Request No. 009 is an MS Excel spreadsheet containing a list of individual locations of all remaining Schedule 40 loads with actual loads by month, by location for the last

three years. PSE does not forecast loads at the customer-specific level requested. However, PSE notes the loads for these locations that will be used in its upcoming rate case are the test year loads billed in the twelve months of October 2015 through September 2016. None of the customers and loads on this list would be eligible for Schedule 451 service.

- d. Attached as Attachment D to PSE's Response to WUTC Staff Data Request No. 009 is an MS Excel spreadsheet containing a list of customers who have maintained a minimum of 10 aMW at one or more of their locations on rate schedule other than Schedule 40, with actual loads by month, by location and applicable tariff schedule for the last three years. Two of the customers included in Attachment D to PSE's Response to WUTC Staff Data Request No. 009 have loads outside Schedule 40 that exceed 10 aMW in addition to load that they have served on Schedule 40. As requested, only the load for these customers served outside of Schedule 40 is included in Attachment D to PSE's Response to WUTC Staff Data Request No. 009. PSE also serves one additional customer, not included in Attachment D to PSE's Response to WUTC Staff Data Request No. 009, which has an aggregated load exceeding 10 aMW when loads served under Schedule 40 are added to loads served on other schedules. PSE does not forecast loads at the customer-specific level requested. However, PSE notes the loads for these locations that will be used in its upcoming rate case are the test year loads billed in the twelve months of October 2015 through September 2016.

Please note that Attachment D to PSE's Response to WUTC Staff Data Request No. 009 is provided in electronic form only.

- e. For the years 2011-2015, please see the table below for an annual summary by Tariff Schedule of all of PSE's forecasted and actual non-core electric customer loads. The load forecasting error is within $\pm 5.2\%$ in each instance. PSE cannot explain these minor differences between forecasted and actual non-core customer load.

<u>Year</u>	<u>Actual mWH Load Schedules 449-459</u>	<u>F2011 Forecast mWH</u>	<u>F2012 Forecast mWH</u>	<u>F2013 Forecast mWH</u>	<u>F2014 Forecast mWH</u>	<u>F2015 Forecast mWH</u>
2011	2,008,543	1,999,144	-	-	-	-
2012	1,980,872	2,000,289	2,048,963	-	-	-
2013	2,085,710	1,996,354	2,058,134	2,085,765	-	-
2014	2,099,959	1,990,954	2,062,985	2,093,350	2,108,953	-
2015	2,012,828	1,981,544	2,066,976	2,106,990	2,116,458	2,114,772

- f. For each of the years 2011-2015, there are no annual loads greater than 5 aMW that ceased service.

Each of Attachments A, B, C, and D to PSE's Response to WUTC Staff Data Request No. 009 is CONFIDENTIAL per Protective Order in WUTC Docket UE-161123.