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PUGET SOUND ENERGY

Puget Sound Energy, Inc.
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Filed via Web Portal

July 30, 2018

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

**Re: Docket A-130355
Small Business Economic Impact Statement**

Dear Mr. Johnson:

Puget Sound Energy (“PSE”) provides this response to the Notice of Opportunity to Respond to the Small Business Economic Statement (SBEIS) Questionnaire (“Notice”) issued July 3, 2018 in the above-referenced docket.

The contact person for this filing is Chris Schaefer, who can be reached at 425-456-2932 and chris.schaefer@pse.com. PSE employs approximately 3,140 full-time equivalent employees.

1. Identify the rule number, *i.e.*, WAC 480-07-160 or 480-07-420, of the draft proposed rule that you identify as having a cost impact;

The proposed changes to WAC 480-07-160 and 480-07-420 have a cost impact to PSE.

2. Identify whether there is any change from the current rule to the draft proposed rule that creates an **additional** cost impact on the company;

The proposed changes from the current rule to the draft proposed rules create additional administrative costs to PSE.

3. Explain why there will be a cost impact on the company;

The cost impact will result from more time required to mark documents pursuant to the more complex rules. This will pose a challenge especially during the discovery process.

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4. Provide a detailed analysis of how you calculated the cost impact of each draft rule you identify as having a cost impact;

Under the current rules, there are two possible designations, Confidential and Highly Confidential. The proposed rules add a new designation: Exempt. Currently, this information would be designated as Confidential, either pursuant to the rule or to a Protective Order. Extra time will be required to identify and label information determined to be Exempt. There is also the added complexity of distinguishing between the different types of restricted information when more than one type appears on the same page. This additional complexity will easily add 1 to 2 minutes for each page with confidential information to ensure the designations are correctly identified. For more complex pages which fit into multiple criteria, the timing could easily reach an additional 5 minutes per page. PSE's biggest concern is the challenge to personnel to review, mark, and check designations during the discovery process, especially after rebuttal testimony is filed during a general rate proceeding when the turnaround time is typically reduced to 5 business days.

Based on PSE's 2017 General Rate Case filing, the company estimates there were more than 4,000 pages of confidential/highly confidential information submitted in testimony/exhibits/data request responses. PSE estimates this would result in more than 133 additional hours of administrative staff time just to ensure the designations are correct under the proposed rules. PSE estimates that the cost, assuming this could be accomplished solely with PSE's administrative staff, would be approximately \$6,650 of additional costs (\$50/hour times 133 hours). This does not include time should PSE's legal counsel be required to review designations.

In a general rate case that includes a new resource being added to the portfolio, the amount of confidential/highly confidential information is increased exponentially. Based on the 2011 General Rate Case, which included more than 6,000 pages of confidential/highly confidential information in the initial filing and more than 5,000 pages of data responses, the additional costs would be even higher. The company estimates that more than 367 hours and approximately \$18,350 of additional costs, again assuming this work can be performed exclusively by PSE's administrative staff.

5. Identify any draft proposed rule that may create a cost savings to the company compared to the current rule.

The rules as proposed will not create cost saving opportunity for the company rather they create additional administrative burden.

PSE appreciates the opportunity to respond to this Notice and encourages the Commission to preserve the current rules regarding Confidentiality.

Mr. Mark L. Johnson

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If you have any questions about the information contained in this filing, please contact Chris Schaefer at chris.schaefer@pse.com or 425-456-2932. If you need any other information, please contact Katherine Barnard, Director, Revenue Requirement & Compliance, at (425) 462-3716 or katherine.barnard@pse.com.

Sincerely,

/s/ Katherine J. Barnard

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