



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

January 31, 2020

NOTICE OF BENCH REQUEST

(Due by Monday, February 9, 2020, at 5 p.m.)

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

TO PUGET SOUND ENERGY (PSE):

BENCH REQUEST No. 1:

- A. The rebuttal testimony of Susan E. Free in Exh. SEF-17T at 2:24-3:9 provides a discussion related to the Company's updated ROE request. Free states that the Company's rebuttal filing includes exhibits supporting the Company's request for an ROE of 9.7 percent, instead of PSE's actual rebuttal request of 9.5 percent. Please refile all related exhibits that are impacted by this correction and include the native formats as required by WAC 480-04-140(6)(a). Please make no other changes than the updates required for the Company's final ROE request of 9.5 percent. Additionally, please highlight only those cells that require manual adjustments, but do not highlight those cells that changed based on formulas flowing through the manual adjustments.
- B. Please confirm that the exhibits provided in the direct and supplemental filings correctly incorporate the Company's initially requested ROE of 9.8 percent. If not, please refile all related exhibits consistent with the request in subpart A.

TO ALLIANCE OF WESTERN ENERGY CONSUMERS (AWEC):

BENCH REQUEST No. 2:

- A. The cross-answering testimony of Bradley G. Mullins in Exh. BGM-8T at 2, Table 1-CA, includes an adjustment that reduces ROE to 9.4 percent. However, AWEC's supporting exhibits, Exh. BGM-9 and Exh. BGM-10, do not incorporate

the proposed ROE of 9.4 percent in its recommended electric and natural gas revenue requirements. Please correct and refile Exh. BGM-9 and Exh. BGM-10, and include native formats as required by WAC 480-04-140(6)(a). Please make no other changes than those required to incorporate AWEC's recommended ROE. Additionally, please highlight only those cells that required manual adjustment, but do not highlight those cells that are changed based on formulas flowing through the manual adjustments.

Please respond to these Bench Requests no later than **5 p.m. on Monday February 9, 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

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

BENCH REQUEST NO. 001

“CONFIDENTIAL” Table of Contents

DR NO.	“CONFIDENTIAL” Material
001	Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-190529 and UG-190530 as marked in Attachment A to Puget Sound Energy’s Response to Bench Request No. 001.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-190529 & UG-190530
Puget Sound Energy
2019 General Rate Case**

BENCH REQUEST NO. 001:

- A. The rebuttal testimony of Susan E. Free in Exh. SEF-17T at 2:24-3:9 provides a discussion related to the Company's updated ROE request. Free states that the Company's rebuttal filing includes exhibits supporting the Company's request for an ROE of 9.7 percent, instead of PSE's actual rebuttal request of 9.5 percent. Please refile all related exhibits that are impacted by this correction and include the native formats as required by WAC 480-04-140(6)(a). Please make no other changes than the updates required for the Company's final ROE request of 9.5 percent. Additionally, please highlight only those cells that require manual adjustments, but do not highlight those cells that changed based on formulas flowing through the manual adjustments.
- B. Please confirm that the exhibits provided in the direct and supplemental filings correctly incorporate the Company's initially requested ROE of 9.8 percent. If not, please refile all related exhibits consistent with the request in subpart A.

Response:

- A. Attached as Attachment A to Puget Sound Energy's ("PSE") Response to Bench Request No. 001, please find a folder which includes all revised exhibits that are impacted by changing the return on equity ("ROE") from 9.7 percent to 9.5 percent. These exhibits include those for revenue requirement, cost of service and attrition. Each file is in its native format as required by WAC 480-07-140(6)(a) and includes highlighting only on cells which require manual adjustments.
- B. Yes, exhibits provided in PSE's direct and supplemental filings correctly incorporate PSE's initially requested ROE of 9.8 percent.

Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-190529 and UG-190530 as marked in Attachment A to PSE's Response to Bench Request No. 001.

ATTACHMENT A to PSE's Response to Bench Request No. 001(C)

**BEFORE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)	DOCKETS UE-190529 and
)	UG-190530 (<i>Consolidated</i>)
Complainant,)	
v.)	RESPONSE TO BENCH REQUEST NO. 2
)	OF THE ALLIANCE OF WESTERN
PUGET SOUND ENERGY,)	ENERGY CONSUMERS
)	
Respondent.)	
<hr/>		
In the Matter of the Petition of)	DOCKETS UE-190274 and
)	UG-190275 (<i>Consolidated</i>)
PUGET SOUND ENERGY)	
)	
For an Order Authorizing Deferral Accounting and Ratemaking Treatment for Short-life UT/Technology Investment.)	
)	
<hr/>		

1 The Alliance of Western Energy Consumers (“AWEC”) submits the following response to the Administrative Law Judge’s Bench Request to AWEC, issued on January 31, 2020 in the above-referenced docket.

Bench Request 2

2 *The cross-answering testimony of Bradley G. Mullins in Exh. BGM-8T at 2, Table 1-CA, includes an adjustment that reduces ROE to 9.4 percent. However, AWEC’s supporting exhibits, Exh. BGM-9 and Exh. BGM-10, do not incorporate the proposed ROE of 9.4 percent in its recommended electric and natural gas revenue requirements. Please correct and refile Exh. BGM-9 and Exh. BGM-10, and include native formats as required by WAC 480-04-140(6)(a). Please make no other changes than those required to incorporate AWEC’s recommended ROE. Additionally, please highlight only those cells that required manual adjustment, but do not*

highlight those cells that are changed based on formulas flowing through the manual adjustments.

AWEC Response to Bench Request 02

3 Please see Revised Exh. BGM-9r and Revised Exh. BGM-10r for the requested information. Modified cells are indicated in orange text with blue highlighting.

4 Based on the revisions, Table 1-BR2 below details the impact of adjustment calculations performed using a 9.4% ROE.

Table 1-BR2
Cross-Answering Revenue Requirement Adjustments (\$000)
With 9.4% ROE

	<u>Electric</u>	<u>Gas</u>
Puget Initial Filing	\$ 104,503	\$ 86,128
Adjustments		
Adjust to 9.4% ROE	(13,727)	(5,323)
AWEC DR 20 Rev. Corrections	(3,491)	42
7.07 Colstrip 1-2 Reg. Accounting	(11,070)	-
7.07 Colstrip 3-4 Depreciation	(23,394)	-
6.03 Interim Protected Plus EDFIT	(5,773)	(1,516)
6.26 Unprotected EDFIT	-	(2,768)
AWEC-1 Data Center Relocation	(5,190)	(2,642)
6.01 P Revenues & Expenses	(12)	-
6.24 P Get to Zero	(7,455)	(3,794)
6.27 P Public Improvements	(1,665)	(750)
6.29 P HR Tops	(1,259)	(641)
7.02 P Montana Tax	(42)	-
7.09 P HMC Cable	(1,566)	-
7.10 P Energy Mgmt. Sys.	26	-
12.01 Smart Burn	(1,096)	-
12.02 Colstrip Outage	(32)	-
12.04 Remove Shuffleton	(114)	-
12.05 Tacoma LNG	-	(3,634)
6.04 Interest Synchronization	1,427	477
Total Adjustments	(74,434)	(20,548)
Adjusted Rev. Req. @ 9.4% ROE	\$ 30,068	\$ 65,581

Dated this 10th day of February, 2020.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Tyler C. Pepple

Tyler C. Pepple, WSBA # 50475

Brent L. Coleman, Colorado State Bar # 44400

1750 SW Harbor Way, Suite 450

Portland, Oregon 97201

Telephone: (503) 241-7242

tcp@dvclaw.com

blc@dvclaw.com

Of Attorneys for the

Alliance of Western Energy Consumers