EXHIBIT NO. \_\_\_(HSY-3HC) DOCKET NO. UG-151663 WITNESS: HAROLD "SKIP" YORK

### BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of

PUGET SOUND ENERGY, INC.

for (i) Approval of a Special Contract for Liquefied Natural Gas Fuel Service with Totem Ocean Trailer Express, Inc. and (ii) a Declaratory Order Approving the Methodology for Allocating Costs Between Regulated and Non-regulated Liquefied Natural Gas Services

**DOCKET NO. UG-151663** 

SECOND EXHIBIT (HIGHLY CONFIDENTIAL) TO THE PREFILED DIRECT TESTIMONY OF HAROLD "SKIP" YORK ON BEHALF OF PUGET SOUND ENERGY, INC.

CONFIDENTIAL PER PROTECTIVE ORDER IN WUTC DOCKET NO. UG-151663

AUGUST 11, 2015 REVISED SEPTEMBER 23, 2015



March 2014

### Natural Gas, ULSD and Fuel Oil Dynamics Study

### Background

Puget Sound Energy (PSE) is requesting a discussion on the price spreads of ULSD and IFO-380 to Sumas natural gas. The intent is to support the appropriate oil pricing outlook for considering future price spreads in the Puget Sound region to be used for contracting purposes. In particular, PSE has asked for an analysis detailing the probable ceiling price on Sumas natural gas and probable floor price on ULSD and IFO-380, drivers behind the current spread, and what factors could lead to a degradation of the spread in the study period (2013-2030) and the likelihood of such circumstances occurring.

The ULSD and IFO-380 price spread to Sumas natural gas will be driven by regional supply/demand dynamics in US PADD V and Western Canada (Figure 1). PADD V covers the US West Coast and consists of Alaska, Arizona, California, Hawaii, Nevada, Oregon, and Washington. Western Canada is defined as the provinces of British Columbia and Alberta for the purposes of this study.

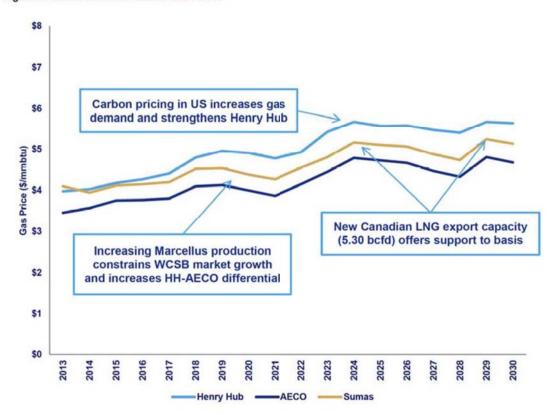
Figure 1: Map of US PADD V and Western Canada



### Sumas Gas Price Dynamics

### Natural Gas Hub Prices

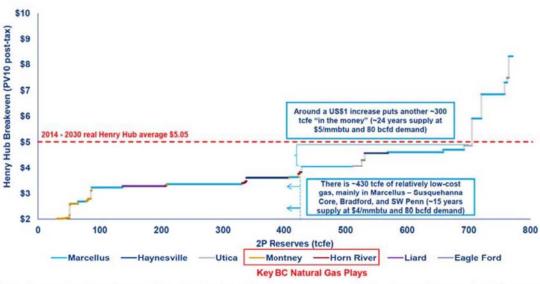
Figure 2: North American Natural Gas Prices



Wood Mackenzie does not forecast a significant recovery of gas prices and expects Sumas gas price to remain in the \$4.00-\$5.25/mmbtu range throughout the study period (Figure 2). Despite price support to Henry Hub due to LNG exports coming online in the Gulf Coast as well as robust industrial demand growth, Sumas sources the majority of its natural gas from British Columbia, which prices its volumes off of AECO. At the AECO hub, price increases are constrained due to limited demand access as well as increasing competition from sources of supply in North America flowing into current end markets (i.e. Marcellus). Consequently, upside to Sumas gas price is limited, and Sumas gas price is not expected to cause the price spread to ULSD/fuel oil to collapse.

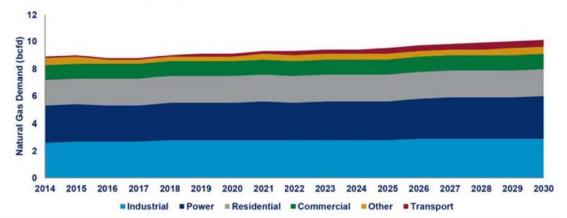
### Natural Gas Supply/Demand Dynamics

Figure 3: PV10 Breakeven Gas Price by Sub-Play



Natural gas price dynamics are driven by the rise of North American unconventionals and the associated increase in volumes of relatively low-cost gas. At prices of \$4/mmbtu, there is ~430 tcf of economic reserves in unconventional plays alone with another ~300 tcf of gas available with just a \$1/mmbtu increase, enough to supply North America for another 24 years at current demand levels (Figure 3).

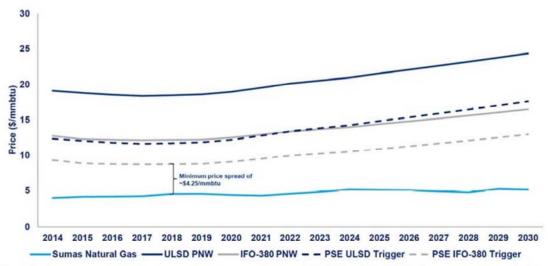
Figure 4: North American Pacific Coast Natural Gas Demand



North American gas demand is expected to grow through the study period, driven by increases in the power generation sector and LNG export facilities coming online. However, the North American Pacific Coast is expected to contribute very little of this growth, with only an increase of ~1 bcfd of demand by 2030 (Figure 4). Industrial growth demand is forecast to be negligible due to a dearth of established industrial projects in the pipeline. NGV penetration is also expected to have little effect as the lack of re-fuelling infrastructure has constrained NGV uptake and competition with hybrid / electric vehicles has further eroded their market share. Opportunity for long-term upside in British Columbia LNG (BCLNG) exists, but high deliverability risk makes the timing and cost of these projects very uncertain. A number of issues must be resolved on technical, political, and fiscal aspects for these projects to move forward. Most tellingly, a large number of these concerns are dependent on regulation and thus are high-risk projects.

### ULSD and IFO-380 Price Dynamics

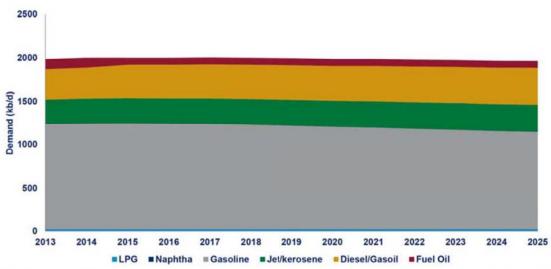
Figure 5: PNW Price Forecast for Sumas Natural Gas, ULSD and IFO-380



Wood Mackenzie expects the basis spreads between natural gas to ULSD and IFO-380 to be sustained throughout the study period due to crude price support and decreased ULSD and IFO-380 price in PNW. Even taking into account the PSE Price Triggers as defined by the PSE contracts, Wood Mackenzie expects a minimum price spread of \$4.25/mmbtu occurring in 2018 before the differential reverses trend and widens through the end of the study period (Figure 5).

### ULSD and IFO-380 Supply/Demand Dynamics

Figure 6: PNW Petroleum Product Demand Forecast



Petroleum product dynamics are not expected to change significantly through 2030 (Figure 6). Demand is forecast to

decrease slightly from ~2000 kb/d in 2014 to ~1960 kb/d in 2030, with diesel demand increasing and fuel oil demand decreasing to small extents over the same timeframe.

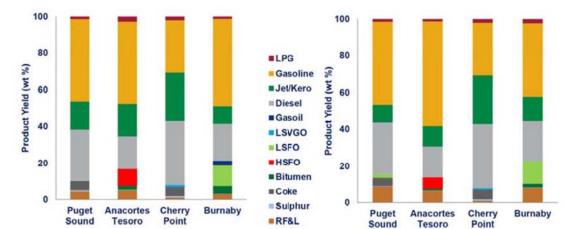


Figure 7: 2012 and 2020 Snapshots of PNW Refinery Yields

Refinery yields in the region are expected to remain relatively consistent with minor changes resulting from increased light, tight oil (LTO) production from the Bakken. However, these changes provide favourable price increases as refining of LTO shifts yields towards the lighter end of the product barrel and decreases supply of ULSD and IFO-380. Further price upside exists as current rail offloading capacity in California and PNW is currently underutilized; should rail buildout occur there is available capability to handle increased volumes of Bakken crude.

### Conclusions and Risk Factors

Figure 8: IFO-380 and ULSD Trigger Prices





Wood Mackenzie expects ULSD and IFO-380 price spreads to Sumas gas to be sustained throughout the study period. Production of ULSD and IFO-380 will decrease due to lightening of the crude slate, while product demand in PNW will remain relatively constant through 2030. Natural gas price growth is expected to remain muted due to the ability to access significant volumes of economic reserves; Sumas will grow even less due to AECO-priced volumes struggling to find end markets.

Wood Mackenzie has identified a number of risk factors to the study, but even in the event of a "perfect storm" scenario, a substantial price spread will still be sustained. Wood Mackenzie's forecast currently includes four BCLNG facilities coming online; even if all projects proposed in the queue were to be constructed, price upside to Sumas natural gas is limited. Therefore, NGV demand would need to increase by an extreme amount (greater than current North American diesel demand) before prices begin to approach trigger prices due to substitution for long-haul trucks and potentially rail. However, the narrowing of the ULSD-Sumas gas spread would impair substitution economics, since increased gas price increased cost of NGV use, making it unlikely a large enough volume swap will occur to drive prices towards each other. On the product side, price support from oil project breakevens keep product prices at a premium to gas. In addition, market forces are able to adjust to worst case scenarios in a span of months to push them back towards the base case.



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## **Background and Objectives**

### Background

## Key objectives of this study

Puget Sound Energy is requesting a discussion on the price spread between Sumas natural gas and ULSD as well as Sumas natural gas and IFO-380. The intent is to support the appropriate oil pricing outlook for considering future price spreads in the Puget Sound region to be used for contracting purposes.

- Understand the minimum spread by examining a probable ceiling price on Sumas natural gas and a probable floor price on ULSD and IFO-380
- Understand what factors and drivers have led to the current spread as well as the sustainability of such factors
- Understand any factors that could lead to a degradation of the spread in the study period (2013-2030) and the likelihood of such circumstances occurring



## **Executive Summary**

Sumas Gas Price Dynamics and Risks

ULSD and IFO-380 Price Dynamics and Risks

Conclusions

## The ULSD and IFO-380 price spread to Sumas natural gas will be driven by regional dynamics in US PADD V and Western Canada **EXECUTIVE SUMMARY**

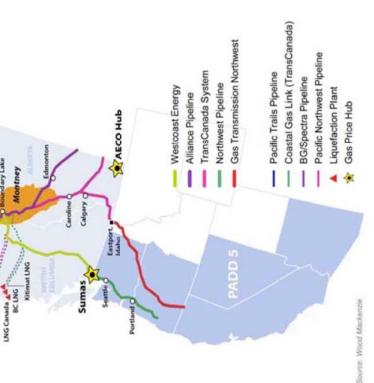
**US PADD V and Western Canada** 

O Ketchikar

Pacific NW LNG AL



- purposes of this study refer to British Columbia Western Canada is commonly defined as the four provinces west of Ontario, but for the and Alberta
- are key to the ULSD and IFO-380 forecast price Supply/demand dynamics in these two regions spread to Sumas natural gas



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**EXECUTIVE SUMMARY** 

## **Executive Summary**

- Wood Mackenzie forecasts Sumas to remain in the \$4.00-\$5.25/mmbtu range and does not expect significant sustained price increases
- There is already ample recoverable gas supply with ~430 tcfe economic under current prices
- » Additional ~300 tcfe of reserves with just a \$1/mmbtu increase in price
- Demand is forecast to grow at a slower pace from ~80 bcfd (~29 tcf/yr) to ~125 bcfd (~46 tcf/yr), with growth driven by increases in the power sector and LNG exports
- ULSD and IFO-380 prices are expected to be sustained at a considerable premium to Sumas gas prices
- constant, with ULSD demand increasing ~76 kb/d and IFO-380 demand decreasing ~37 kb/d Overall product demand on the North American Pacific Coast is forecast to remain relatively
- Supply is skewed towards the lighter end of the barrel due to PNW refineries running higher volumes of Bakken crude (LTO)
- Wood Mackenzie has identified potential risk factors to our forecast but expects the price spread to persist even in a "perfect storm" worst case scenario
- Sumas gas price has potential upside from LNG exports, NGV demand, and US carbon policy regulations, but these factors are all dependent upon regulatory policy
- ULSD and IFO-380 demand will be affected by regulations such as LCFS and MARPOL as well as refinery crude slates but prices are supported by breakevens for new oil projects needed to meet projected demand
- Circumstances approaching PSE's "price triggers" would be extreme market imbalances and would resolve as the market reacts – this would occur in months, not years \*

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## Supply increases driven by shale production in North America will drive further expansions of the crude products/gas price spread **EXECUTIVE SUMMARY**

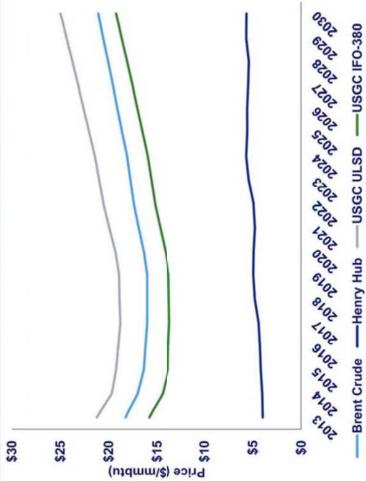
Crude Oil / Natural Gas Price Spread (mmbtu basis)

accessibility to reserves is Henry Hub price remains significantly lower than more than sufficient to meet forecast demand crude prices as growth

Crude pricing is forecast pricing is strengthened by to soften in the short to demand risks in OECD In the long-term, crude medium term due to markets

breakeven economics for increasing demand and marginal projects

Increased LTO production towards the lighter end of the barrel, limiting supply skews refinery output of ULSD and IFO-380



Source: Wood Mackenzie

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**Executive Summary** 

Sumas Gas Price Dynamics and Risks

ULSD and IFO-380 Price Dynamics and Risks

Conclusions

Appendix

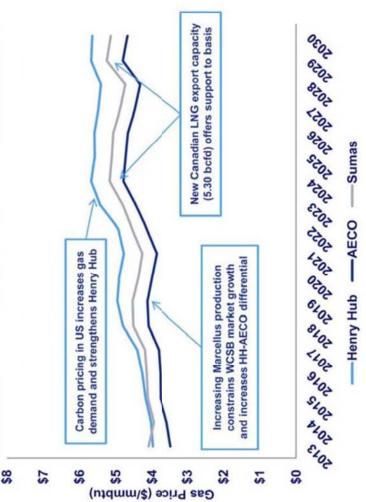
PUGET SOUND ENERGY Wood Mackenzie

## despite increased demand driven by regulatory policies and LNG exports Wood Mackenzie does not forecast a significant recovery of gas prices, SUMAS GAS PRICE DYNAMICS AND RISKS

exports and industrial strengthened by LNG Henry Hub is largely North American Natural Gas Price



- Price increases at AECO supply in North America limited demand access competing sources of as well as increasing are constrained by production from
- causing it to remain at a majority of its natural Sumas sources the Columbia which is priced off AECO. gas from British premium due to transport cost



D Wood Mackenzie

Source: Wood Mackenzle

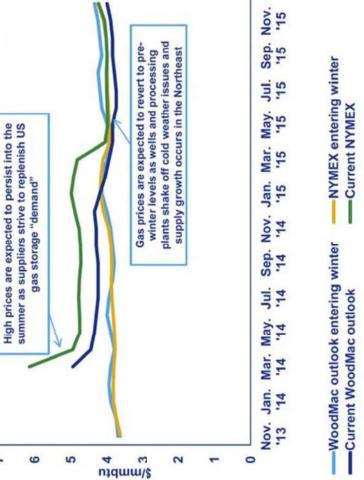
# SUMAS GAS PRICE DYNAMICS AND RISKS

# Recent gas prices have been driven by colder than normal weather in several regions, but fundamentals return to the norm in the long-term

Henry Hub Short-Term Price Forecast

# • This winter has been the coldest since 2000-2001, causing increased gasfired generation, and withdrawals from US storage have been well above average levels drawn historically

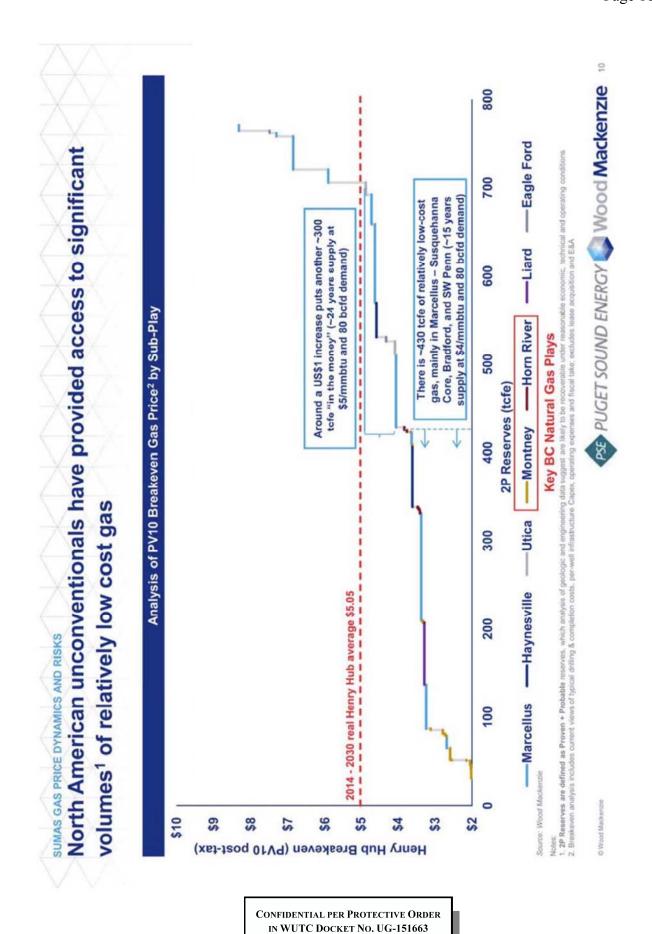
- » Prices will be sustained in the short-term as suppliers strive to refill US storage "demand"
  - However, Wood Mackenzie expects this to be a shortlived phenomenon as temperatures revert to the norm
- As demand falls back to normal levels, supply will increase driven by relief of cold-weather issues (plant shutdowns, well freezeoffs) and increased production from the Northeast



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Source: Wood Mackenzie



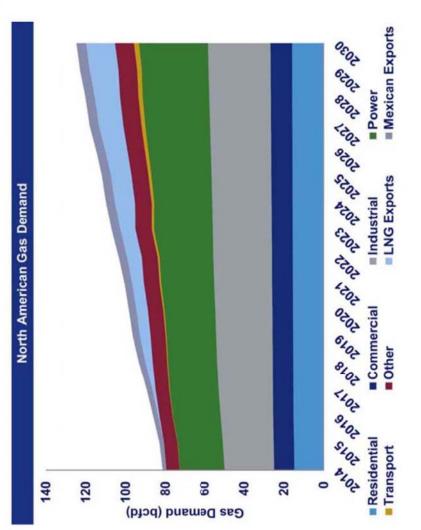
**REVISED 9/23/2015** 

# North American gas demand is expected to grow through the study period, SUMAS GAS PRICE DYNAMICS AND RISKS

driven mainly by the power sector and LNG exports



- LNG exports are expected other global sources into to add another 15 bcfd (5 compete strongly with bcfd from BCLNG) to demand by 2030 and the Asian markets
  - bcfd of industrial demand by 2030 as low gas prices supports an additional 7 investment in additional competiveness and lead to increasing industrial capacity **Economic growth**

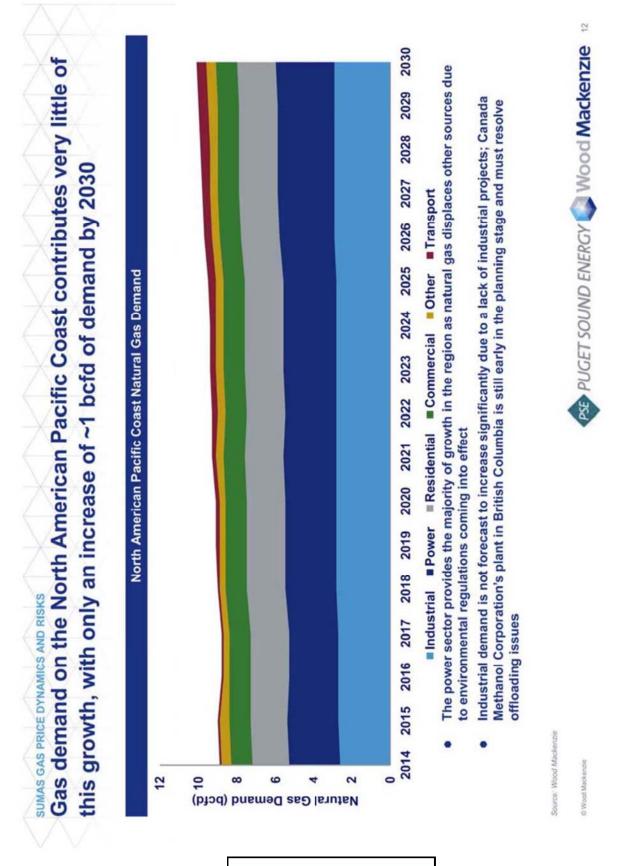


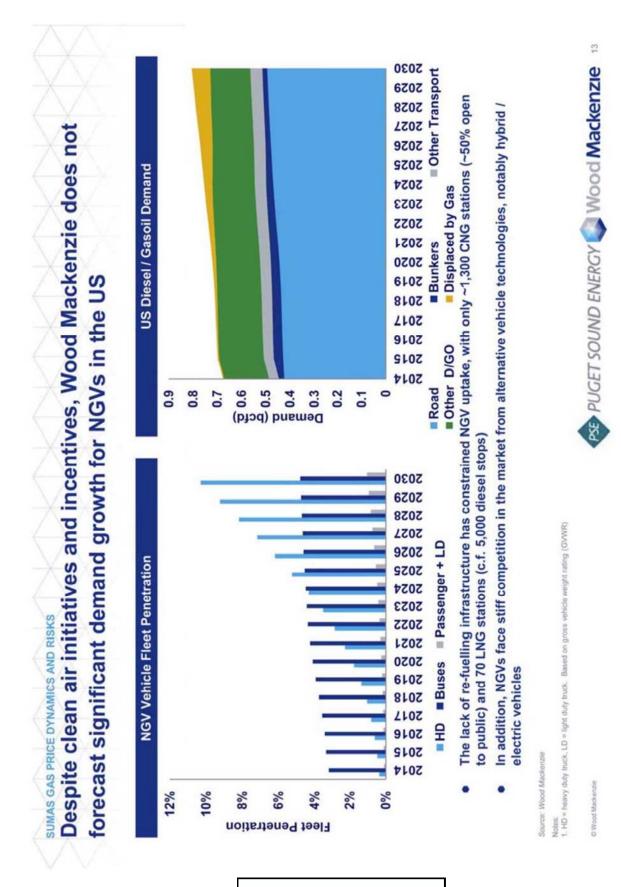
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Source: Wood Mackenzie

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# North American LNG export projects are expected to be competitive into SUMAS GAS PRICE DYNAMICS AND RISKS



2020 Est. Delivered Cost<sup>1</sup> Comparison with Competing Projects into Asia

19

16

4



- capacity greatly exceeds forecast LNG appetite Proposed liquefaction
- LNG exports from Western Canada are intriguing due number of challenges: to proximity to Asian markets, but face a
- Remote location of source gas plays (Montney and Horn River)
- Regulatory hurdles to secure right-of-ways and approvals (including First Nations)
  - labor force competition with High costs due largely to oil sands

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USD/mmbtu

## SUMAS GAS PRICE DYNAMICS AND RISKS

# There is opportunity for long-term upside in Canadian LNG but high deliverability risk makes timing and costs very uncertain

Project (Partners)	NEB export license status	Proposed Capacity (1st phase, mmtpa/bcfd)	Location
Kitimat LNG (Apache, Chevron)	Received	10.0 / 1.3	Kitimat
BC LNG Export Co-op (LNG Partners, Haisla First Nation, Golar)	Received	0.9 / 0.1	Kitimat
LNG Canada (Shell, PetroChina, KOGAS, Mitsubishi)	Received	12.0 / 1.6	Kitimat
Pacific Northwest LNG (PETRONAS, JAPEX)	Approved	12.0 / 1.6	Prince Rupert
WCC LNG (Exxon Mobil, Imperial)	Approved	30.0 / 3.9 (NEB Application Total)	Not finalized
Prince Rupert LNG (BG Group)	Approved	14.0 / 1.8	Prince Rupert
Woodfibre LNG (Pacific Oil & Gas)	Approved	2.1/0.3	Squamish
Jordan Cove' (Veresen)	Approved	6.0 / 0.8	Coos Bay, Oregon
Triton LNG (AltaGas, Idemitsu)	Applied	2.3 / 0.3	Not finalized (Kitimat or Prince Rupert proposed)
Aurora LNG (Nexen, INPEX, JGC)	Applied	24.0 / 3.1	Prince Rupert
Kitsault LNG (Kitsault Energy)	Applied	20.0 / 2.6	Kitsault
Oregon LNG <sup>2</sup> (Leucadia)	Applied	9.6 / 1.3	Warrenton, Oregon

### Technical challenges:

- Greenfield construction with limited labor and resources
- achieve sufficient feed gas campaigns necessary to Aggressive drilling
  - Infrastructure buildout is necessary to support proposed LNG volumes

### Political/fiscal challenges:

- Nations have protested use Local stakeholder support of their land in the past must be secured; First
  - Concerns that LNG fiscal competitiveness (i.e. policy might burden proposed LNG tax)
- scrutinizing future approvals Possibility of NEB

### Corporate appetite:

Major developers seeking to (PETRONAS, KOGAS farmdowns) may indicate a "waitand-watch" approach lower exposure

Included in WM Forecast

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Source: Wood Mackenzie

Jordan Cove is proposed in the US but plans to source feedgas from Canada Oregon LNG is proposed in the US but plans to source feedgas from Canada

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## Even if additional LNG projects come online, British Columbia LNG is expected to have a negligible effect on Sumas gas price SUMAS GAS PRICE DYNAMICS AND RISKS

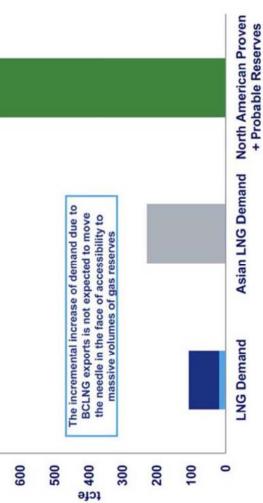
**BCLNG Demand Comparison\*** 

800

200



- online and flows increase, Sumas gas price receives support and strengthens As LNG capacity comes ~2021
  - stranded Horn River gas imited as the increased However, this effect is stakeholder interests price along with LNG encourage access to



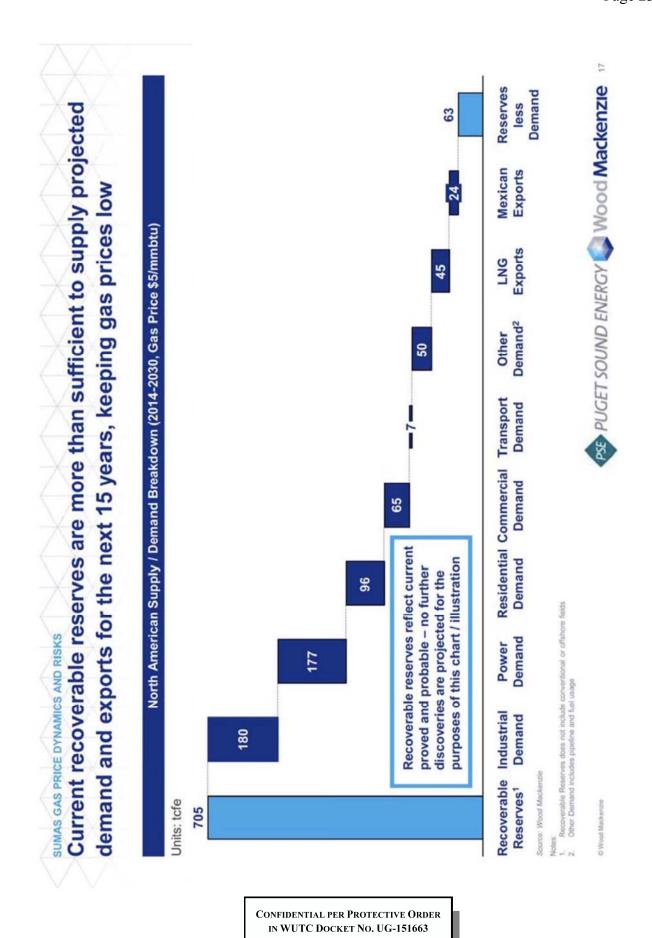
wes based on \$5/mmblu Henry Hub price. Demand and LNG usage ostimated out to 2030. ■ Total Proposed BCLNG Capacity Usage ■ Forecast BCLNG Capacity Usage Forecast and Total Proposed BCLNG Capacity Usage assumes 100% capacity utilization. 2P

Asian LNG Demand

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Source: Wood Mackenz

Reserves



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## There is more downside than upside price risk to the Sumas price forecast as many strengthening factors are dependent on regulatory policy SUMAS GAS PRICE DYNAMICS AND RISKS

Risk Factor	Consequences	Effect on Sumas Gas Price	Impact
LNG Exports	Several LNG projects are in various stages of the approval process for LNG exports into Asian markets     Canadian and US West Coast LNG exports will use source gas from British Columbia	Price Increase: Increase in demand and linking to Aslan gas prices	Low
NGV Usage Growth	The US DoE Clean Cities Coalition is incentivizing the use of alternative and renewable fuels to reduce petroleum consumption Ongoing initiatives to increase NGV re-fuelling infrastructure improves accessibility to CNG and increases natural gas demand	Price increase: increased gas demand from higher NGV penetration into the vehicle fleet	Low
US Carbon Policy Regulations	Previous proposals for carbon regulations (Bingman-Specter, Kerry-Lieberman) have garnered political backing in the past, and rising emissions levels are expected to produce increased political pressure     A tightening of carbon emissions causes the power sector to switch from coal to natural gas for its energy source, increasing gas demand	Price Increase: Increased gas demand for the power sector	Medium
Shale Gas Supply / Production Growth	Continued delineation and improvements in operational efficiencies increases natural gas reserves and production, providing additional supply	Price Decrease: Increased gas supply from available economic reserves	High
Source: Wood Mackenzie		Price Decrease Price Increase No	No Price Effect

# Sumas Gas Price Dynamics and Risks Sumas Gas Price Dynamics Overview

Wood Mackenzie forecasts Sumas gas price to remain in the \$4.00-\$5.25/mmbtu range throughout the study period and does not expect price to increase significantly Recent temperature patterns have resulted in price spikes for natural gas, but Wood Mackenzie does not expect these trends to sustain gas prices in the long-term North American unconventionals have provided access to considerable volumes of lowcost shale gas, far outpacing forecasted demand growth

Demand growth resulting from NGVs is not expected to be significant due to re-fuelling infrastructure constraints and competition from alternative vehicle technology Despite long-term opportunity for exports from BCLNG, these projects face a number of technical, political, and fiscal challenges that must be overcome



Wood Machine



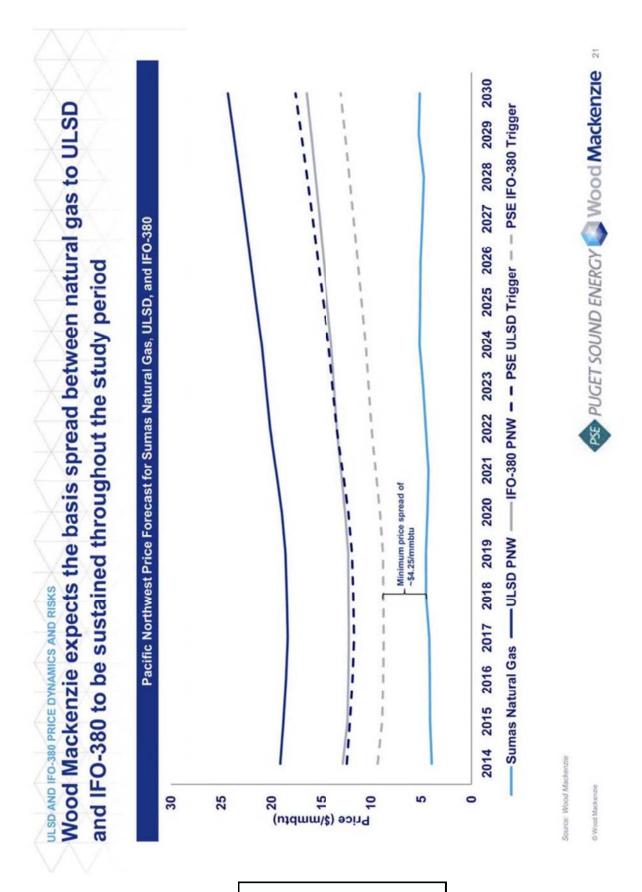
**Executive Summary** 

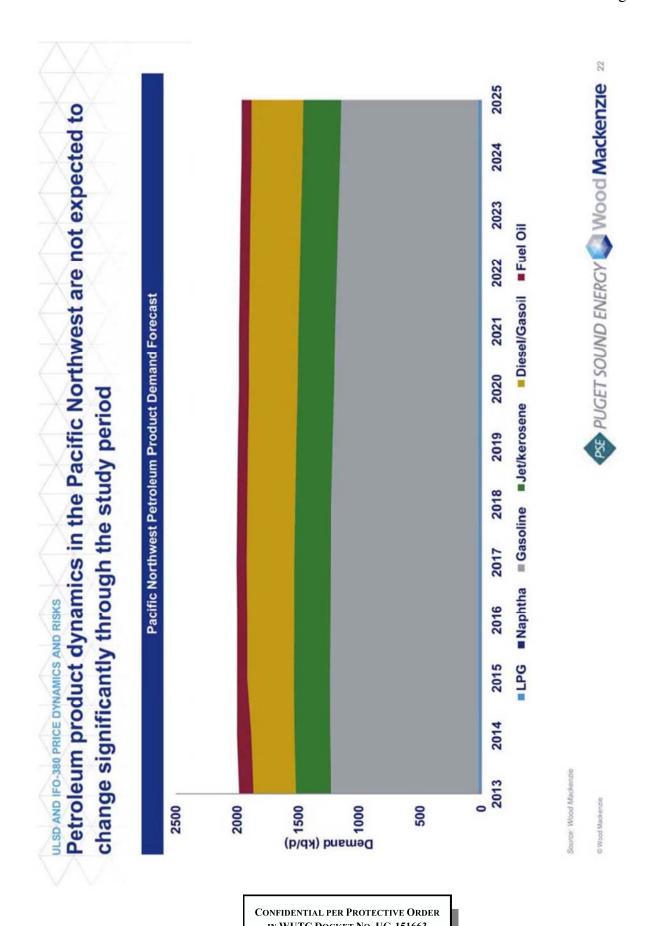
Sumas Gas Price Dynamics and Risks

**ULSD and IFO-380 Price Dynamics and Risks** 

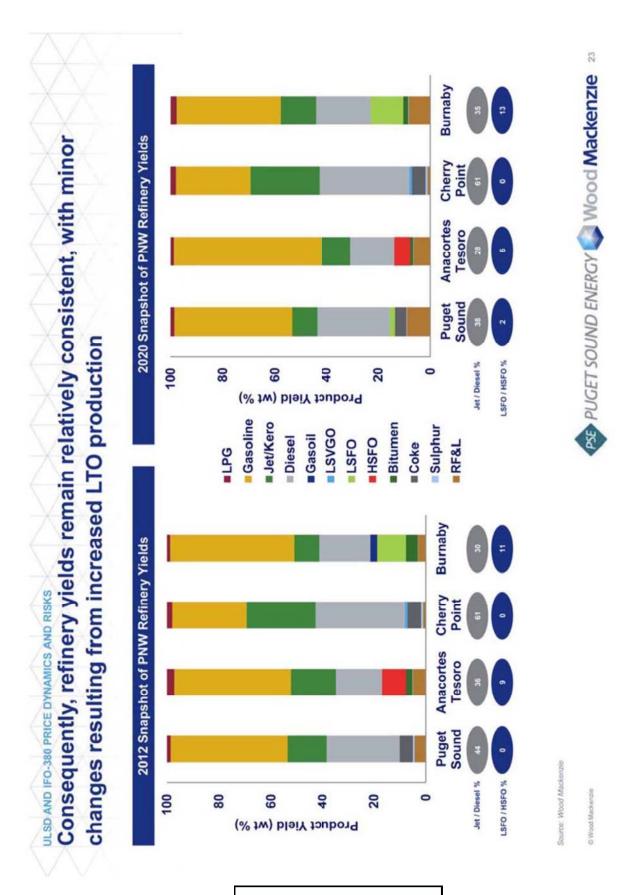
Conclusions

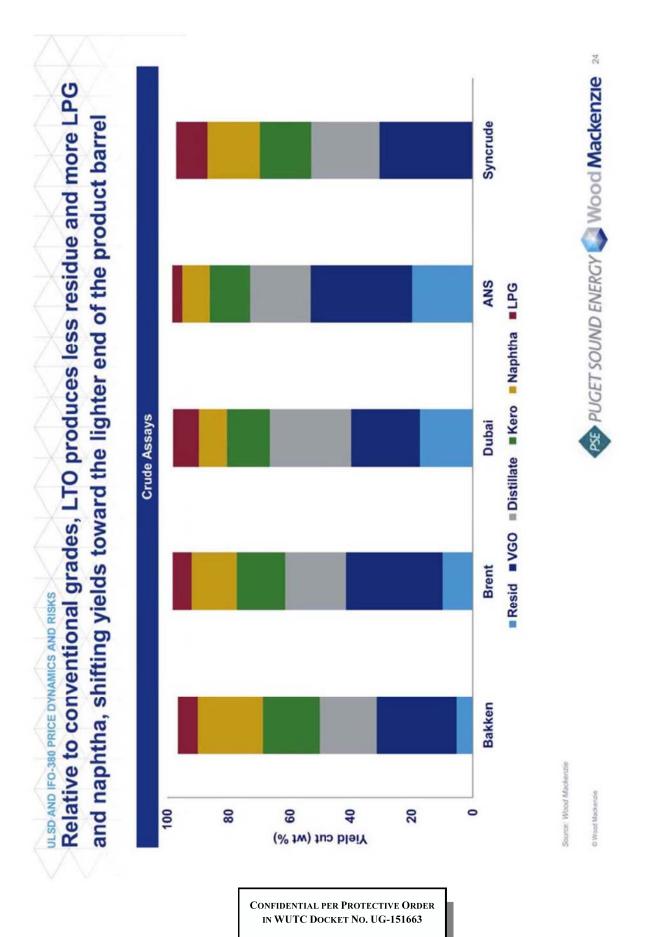
Appendix



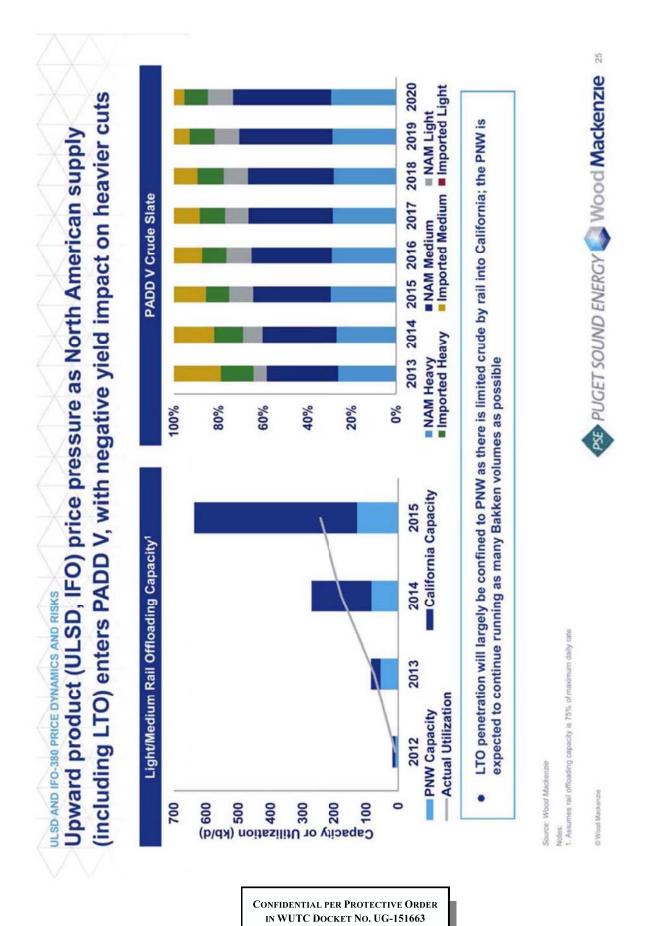


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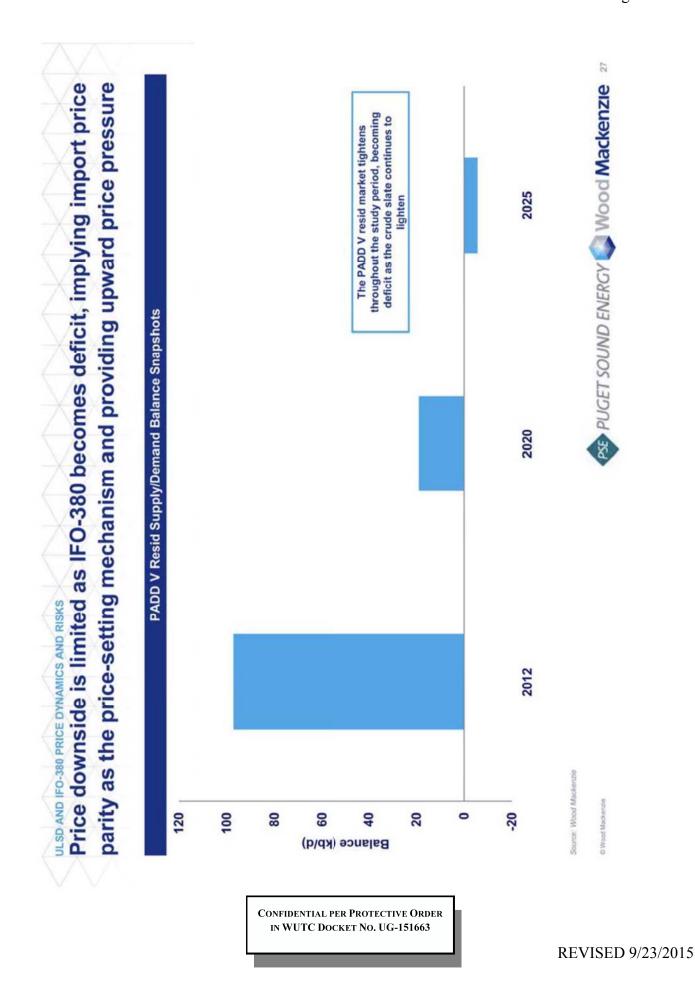
PUGET SOUND ENERGY Wood Mackenzie

## Wood Mackenzie has identified a number of possible risk factors to our **ULSD and IFO-380 price forecast** ULSD AND IFO-380 PRICE DYNAMICS AND RISKS

California LCFS Regulations California LCFS Regulations California LCFS Regulations California LCFS Regulations California cxports of non-LCFS diesel, Price Decrease: decreased demand diesel find a new market in Asia (Singapore) Due to the more stringent diesel and exports to Asian markets California LCFS Regulations California cxports of non-LCFS diesel, price find a new market in Asia (Singapore) Due to the more stringent diesel and exports to Asian markets in Singapore)  MARPOL Regulations  MARPOL Regulations  California LCFS Regulations  California cxports of non-LCFS diesel, price findensed diesel finishing becomes more valuable and exports to Asian markets  MARPOL Regulations  California LCFS Regulations  California cxports of new market in Asia and exports to Asian markets  MARPOL regulations  California LCFS Regulations  California cxports of new market in Asia and exports to Asian markets  MARPOL regulations  California LCFS Regulations  California cxports of new market in Asia and exports to Asian markets  MARPOL regulations  California cxports of new market in Asia  MARPOL regulations  California cxports of new market in Asia  MARPOL regulations  California cxports of new market in Asia  MARPOL regulations  California exports of new market in Asia  MARPOL regulations  California cxports  California exports of new market in Asia  MARPOL regulations  California exports of new market in Asia  MARPOL regulations  California exports of new market in Asia  MARPOL regulations  California exports of new market in Asia  California exports of new of	Effect on ULSD Price   Effect on IFO-380 Price
California exports of non-LCFS diesel find a new market in Asia (Singapore)  Due to the more stringent diesel specifications, hydrotreating finishing becomes more valuable  MARPOL regulations cause gasoll to be substituted for fuel oil, increasing diesel demand  Fuel oil is pushed out of the bunker market, increasing gasoll price and decreasing resid price  A short balance of heavy crude increases the value of resid  Reduced distillate yield reduces the supply of ULSD  Reduced resid yield increases the cricical selections which are	
Due to the more stringent diesel specifications, hydrotreating finishing becomes more valuable     MARPOL regulations cause gasoil to be substituted for fuel oil, increasing diesel demand     Fuel oil is pushed out of the bunker market, increasing gasoil price and decreasing resid price  A short balance of heavy crude increases the value of heavy crude, which in turn increases the value of resid  Reduced distillate yield reduces the supply of ULSD Reduced resid vield increases the calculate which are	Price Decrease: decreased demand increases due to hydrotreating and exports to Asian markets becoming more valuable in the face of more etinoant discale profile and exports.
MARPOL regulations cause gasoil to be substituted for fuel oil, increasing diesel demand     Fuel oil is pushed out of the bunker market, increasing gasoil price and decreasing resid price  A short balance of heavy crude increases the value of heavy crude, which in turn increases the value of the substitute of the substitute of LSD  Reduced distillate yield reduces the supply of ULSD  Reduced resid vield increases the residuals which are	
Fuel oil is pushed out of the bunker market, increasing gasoil price and decreasing resid price     A short balance of heavy crude increases the value of heavy crude, which in turn increases the value of resid      Reduced distillate yield reduces the supply of ULSD     Reduced resid vield increases the confective increases.	Price Decrease: decreased IFO-380
A short balance of heavy crude increases the value of heavy crude, which in turn increases the value of resid     Reduced distillate yield reduces the supply of ULSD     Reduced resid yield increases the confect of residuals which are	ŏ
Reduced distillate yield reduces     the supply of ULSD     Reduced resid yield increases     the price of residuals which are	Price Increase: increased value of resid causes processing cost of IFO-
Reduced resid yield increases     the price of residuals which are	
used to blend fuel oil	ce increases treir price, causing cost of IFO-380 processing to increase as well as well

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Notes: 1. LCFS = Low Carbon Fuel Standard.







**Executive Summary** 

Sumas Gas Price Dynamics and Risks

ULSD and IFO-380 Price Dynamics and Risks

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Appendix

## CONCLUSIONS Key Conclusions

# Even in the event of a "perfect storm", a substantial price spread will emerge and be

- Gas demand (e.g. LNG, NGV) needs to increase by an extreme amount before prices begin to approach trigger prices
- Decreasing supply from increased LTO and price support from oil project breakevens keep product prices at a premium versus gas
- Market forces are able to adjust to worst case scenarios in a span of months to push them back towards the base case

# ULSD and IFO-380 price spreads to Sumas gas are sustained throughout the study period as crude supply shifts towards lighter products

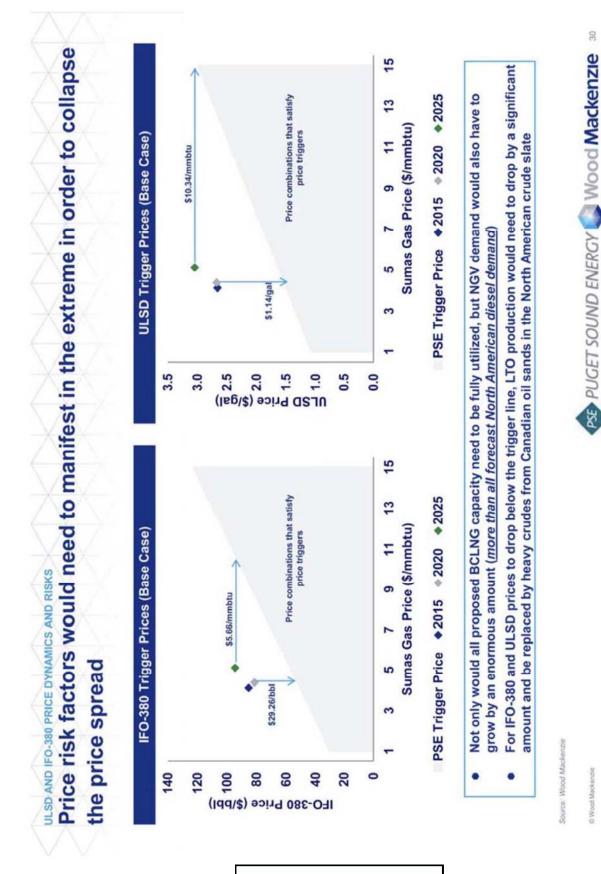
- Production of ULSD and IFO-380 will decrease due to lightening of the crude slate, while overall product demand in PNW is forecast to remain relatively constant through 2030
- PNW is a net importer of ULSD and net exporter of IFO-380 so price-setting mechanisms do not change ^
- IFO-380 price has the potential to strengthen due to local resid market deficit with lighter USWC crude slate

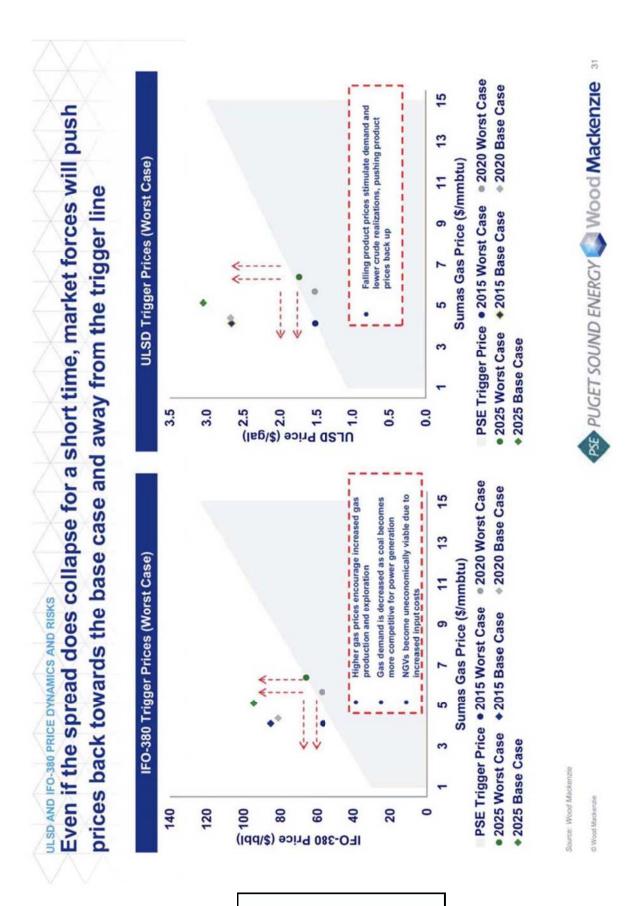
# Wood Mackenzie does not expect Sumas gas price to increase significantly, remaining in the \$4.00-\$5.25/mmbtu range

- Currently existing 2P reserves are sufficient to supply forecast demand through at least 2030
- Even a doubling of LNG demand and NGV penetration does not materially change production cost



Wood Mackens







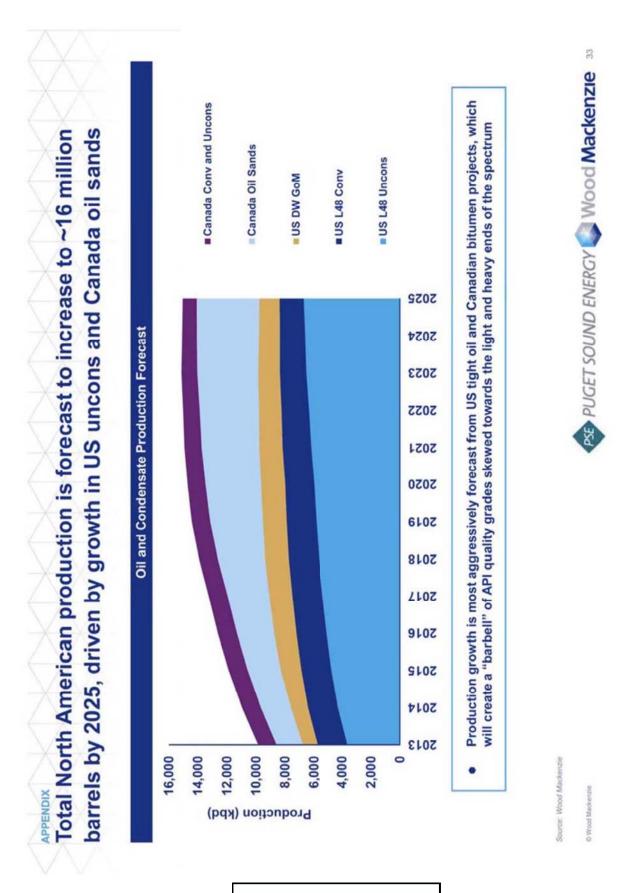
**Executive Summary** 

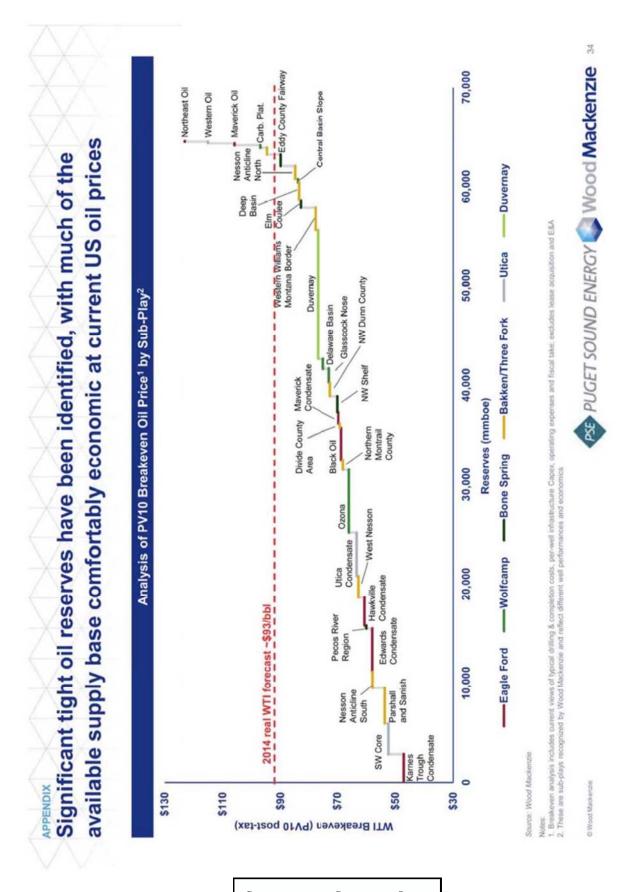
Sumas Gas Price Dynamics and Risks

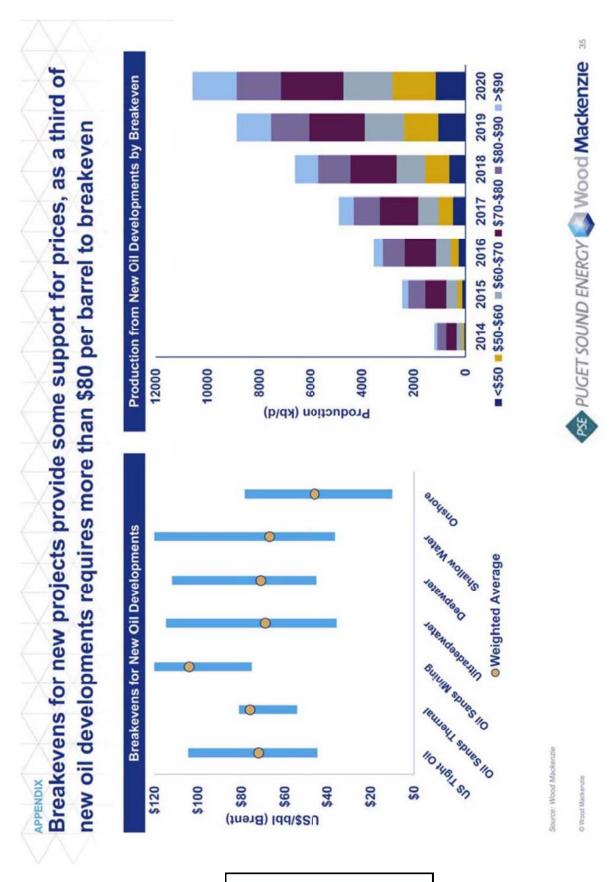
ULSD and IFO-380 Price Dynamics and Risks

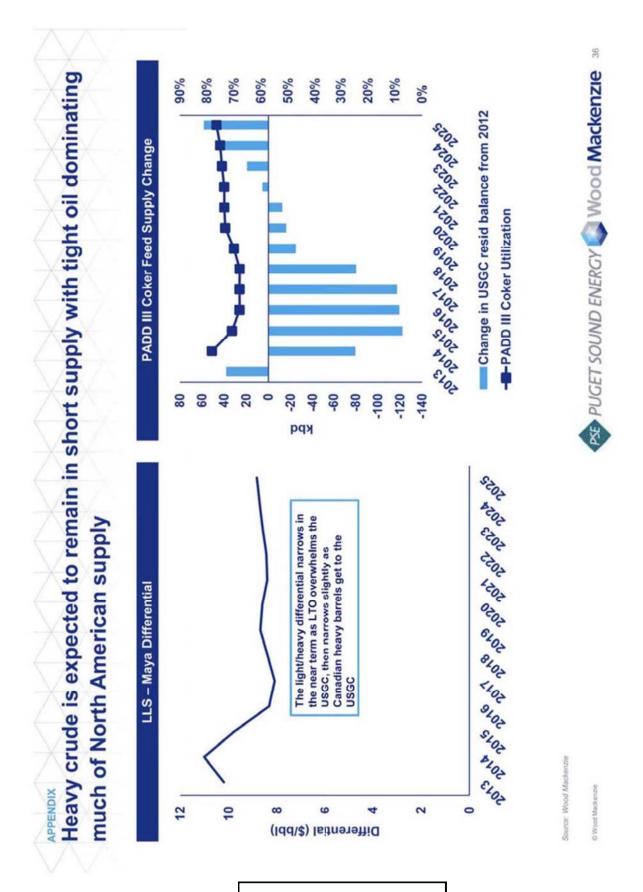
Appendix

Conclusions











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