

**EXH. PJP-\_\_X  
DOCKET UE-210795  
2022 PSE CEIP  
WITNESS: PHILLIP J. POPOFF**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of  
PUGET SOUND ENERGY, INC.  
2021 Clean Energy Implementation Plan

**Docket UE-210795**

**EXHIBIT TO THE CROSS-EXAMINATION OF  
PHILLIP J. POPOFF  
ON BEHALF OF NW ENERGY COALITION AND FRONT AND CENTERED**

**JANUARY 24, 2023**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UE-210795  
Puget Sound Energy  
PSE 2021 Clean Energy Implementation Plan**

**FRONT AND CENTERED AND NW ENERGY COALITION DATA REQUEST NO. 210:**

**Topic:** Popoff Testimony (SCGHG Modeling)

In the CEIP, PSE reported cumulative incremental costs between 2022 and 2025 to be \$450 million (the sum of cells E22:H22 in the “7. Incremental Cost” tab of 210795-PSE-Appendix-E-2-Incremental-Cost-Calculation-Spreadsheet.xlsx). This calculation assumed that the cumulative costs associated with generation, EE, and DR in the No CETA portfolio were \$2,582 million (the sum of cells B7:E7 in the “3. Resource Incremental Cost” tab of 210795-PSE-Appendix-E-2-Incremental-Cost-Calculation-Spreadsheet.xlsx). PSE reported in the response to Data Request No. 178 that the cumulative costs between 2022 and 2025 associated with generation, EE, and DR in the “No-CETA” portfolio described in the Rebuttal Testimony of Phillip J. Popoff, which was developed by applying the SCGHG to dispatch in the capacity expansion run, were \$2,679 million (the sum of the “SCGHG Dispatch Annual Cost – No-CETA portfolio” row in Table 1 of PSE’s response to Data Request No. 178). We therefore calculate that if PSE were to use the “No-CETA” portfolio described in the Rebuttal Testimony of Phillip J. Popoff, which was developed by applying the SCGHG to dispatch in the capacity expansion run, cumulative incremental costs between 2022 and 2025 would equal \$450 million + \$2,582 million - \$2,679 million = \$353 million, or \$97 million less than the cumulative incremental costs presented in the CEIP.

- a. Please confirm if the calculation described above is consistent with PSE’s incremental cost calculation methodology. If this calculation is not correct, please provide the total cumulative incremental costs between 2022 and 2025 using the “No-CETA” portfolio described in the Rebuttal Testimony of Phillip J. Popoff, which was developed by applying the SCGHG to dispatch in the capacity expansion run.
- b. PSE also reported in the CEIP that 2% annual revenue increases between 2022 and 2025 would accumulate to \$426 million (sum of cells E9:H9 in the “7. Incremental Cost” tab of 210795-PSE-Appendix-E-2-Incremental-Cost-Calculation-Spreadsheet.xlsx). We therefore calculate that using the “No-CETA” portfolio described in the Rebuttal Testimony of Phillip J. Popoff, which was developed by applying the SCGHG to dispatch in the capacity expansion run, would result in cumulative incremental costs between 2022 and 2025 that are \$426 million - \$353 million = \$73 million less than PSE’s estimated cumulative effects of 2% annual revenue increases over the same period. Please confirm if this calculation is consistent with PSE’s incremental cost

and 2% revenue increase calculation methodologies. If it is not, please provide the difference between the cumulative effects of 2% annual revenues increase between 2022 and 2025 and the cumulative incremental costs using the “No-CETA” portfolio described in the Rebuttal Testimony of Phillip J. Popoff, which was developed by applying the SCGHG to dispatch in the capacity expansion run.

**Response:**

- a. Yes, the calculation described in Front and Centered and NW Energy Coalition Data Request No. 210 is correct.
- b. Yes, the calculation described in Front and Centered and NW Energy Coalition Data Request No. 210 is correct.