

PUGET SOUND PILOTS' RESPONSES TO UTC STAFF DATA REQUESTS Nos. 51-54

DATE PREPARED: March 15, 2023 DOCKET: TP-220513 REQUESTER: UTC Staff	WITNESS: WELDON BURTON RESPONDER: WELDON BURTON PUGET SOUND PILOTS DATE: March 15, 2023 TEL: (360) 727-3643 EMAIL: weldon@weldontburtoncpa.com
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UTC STAFF DATA REQUEST NO. 51:

In the Rebuttal testimony of Weldon T. Burton, Burton suggests that the PPP loan was included in the revenue requirement for the prior PSP rate case (Docket TP-190976).

- a. Did PSP use a hybrid test year of 2018-2019 for docket TP-190976?
- b. Did PSP submit a pro forma request to include the revenue from the PPP loan that was received in 2020 for docket TP-190976?
- c. If PSP did submit such a pro forma request, please provide all supporting documents showing the PPP loan was included in the revenue requirement approved by the Commission in Docket TP-190976.

RESPONSE TO UTC STAFF DATA REQUEST NO. 51:

It is inappropriate to imply or insinuate that this witness suggested or proposed that the PPP loan funds be included in revenue. It was never my intention to "suggest" that the PPP loan was included or should be included in the revenue requirement for the prior PSP rate case (Docket TP-190976). This forgiven small business loan was received on May 8, 2020, just prior to the conclusion of the previous rate case and prior to the test year for the current PSP rate case, TP-220513. To include this amount in pro forma revenue would violate the retroactive ratemaking principle as discussed in my supplemental testimony as well as my rebuttal testimony. With that being said, the answers to staff's questions are below.

- a. Yes. PSP used a hybrid test year of 2018-2019 for docket TP-190976.
- b. No. PSP did not submit a pro forma request to include the revenue from the PPP loan that was received in 2020 for docket TP-190976, because there was no way for PSP to know that they would receive this loan during the previous case.
- c. Not applicable.