EXH. SEF-15 DOCKETS UE-240004/UG-240005 2024 PSE GENERAL RATE CASE WITNESS: SUSAN E. FREE

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

Docket UE-240004 Docket UG-240005

FOURTEENTH EXHIBIT (NONCONFIDENTIAL) TO THE PREFILED DIRECT TESTIMONY OF

SUSAN E. FREE

ON BEHALF OF PUGET SOUND ENERGY

Summary of Requested O&M

Row	Description	2025	2026
6	Board approved target	\$ 848,000,000	\$ 876,000,000
8	Add: Incremental Wildfire Costs	3,329,579	3,819,757
9	Add: Phase 2 Decarb Study Costs	10,600,000	11,700,000
10	Add: Participatory Funding	-	-
11	Add: LTIP	966,856	1,000,696
12	Total Approved Plan as Adjusted	\$ 862,896,435	\$ 892,520,453
14	Remove Non-Utility/Non-Rate Case (Puget LNG, Low Income Amort, Green Power)	(72,755,380)	(71,199,304)
15	Remove Items Recovered Elsewhere (Colstrip, Transp Elect, Unselected CETA projects)	(45,340,995)	(29,684,165)
16	Regulatory Adjustments (mainly RSIs on above and GAAP Pension to regulatory)	(24,542,603)	(34,063,463)
17	Total Requested O&M	\$ 720,257,457	\$ 757,573,521
18		·	
19			
20	Base Rates	\$ 678,539,269	\$ 713,787,536
21	Schedule 141CGR - Clean Generation Resources Tracker	13,631,606	13,904,238
22	Schedule 141WFP - Wildfire Prevention Cost Recovery Adjustment	17,486,582	18,181,747
23	Schedule 141DCARB - Decarbonization Rate Adjustment	10,600,000	11,700,000
24	Total Requested O&M	\$ 720,257,457	\$ 757,573,521

Summary of Requested O&M

Total Approved Plan as Adjusted \$ 862,896,435 \$ 892,520,453 Remove Non-Utility/Non-Rate Case (11,865,590) (14,088,537) Puget LNG (11,865,590) (54,699,875) Green Power Certificates [p] (2,312,291) (2,410,892) Subtotal Remove Non-Utility/Non-Rate Case (72,755,380) (71,199,304) Remove Items Recovered Separately: (13,631,606) (13,904,238) Unselected CETA Projects (Schedule 141CGR) (1,949,209) (10,580,634) Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,500,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,288) Add Incremental Items: Participatory Funding 19,745 209,155 Long Term Incentive Program 19,745 209,155 35,866,1725 (73,260,995) Subtotal Adjustments for Items Recovered Separately (86,861,725) (Description	2025	2026			
Puget LNG (11,865,590) (14,088,537) Low Income Amortization (58,577,499) (54,699,875) Green Power Certificates [p] (2,312,291) (2,410,892) Subtotal Remove Non-Utility/Non-Rate Case (72,755,380) (71,199,304) Remove Items Recovered Separately: Beaver Creek (Schedule 141CGR) (13,631,606) (13,904,238) Unselected CETA Projects (Schedule 141CGR) (1,949,209) (10,580,634) Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,000,000) (11,700,000) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Tarnsportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding 19,7459 209,155 Long Term Incentive Program 19,7459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments (9,586,220)	Total Approved Plan as Adjusted	\$ 862,896,435	\$ 892,520,453			
Low Income Amortization (58,577,499) (54,699,875) Green Power Certificates [p] (2,312,291) (2,410,892) Subtotal Remove Non-Utility/Non-Rate Case (72,755,380) (71,199,304) Remove Items Recovered Separately: (13,631,606) (13,904,238) Beaver Creek (Schedule 141CGR) (1,949,209) (10,580,634) Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,600,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding 197,459 209,155 Long Term Incentive Program 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments (9,586,220) (10,959,569) Adjust Filing Fees to match revenues (9,586,220) (10,959,569)	Remove Non-Utility/Non-Rate Case					
Green Power Certificates [p] (2,312,291) (2,410,892) Subtotal Remove Non-Utility/Non-Rate Case (72,755,380) (71,199,304) Remove Items Recovered Separately: (13,631,606) (13,904,238) Beaver Creek (Schedule 141CGR) (1,949,209) (10,580,634) Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,600,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: 2 1 Participatory Funding 197,459 209,155 Long Term Incentive Program 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments \$703,279,330 \$748,060,153 Regulatory Adjust ments: (9,586,220) (10,959,569) Adjust Plais Fees to match revenues (9,586,220)	Puget LNG	(11,865,590)	(14,088,537)			
Subtotal Remove Non-Utility/Non-Rate Case (72,755,380) (71,199,304) Remove Items Recovered Separately: (13,631,606) (13,904,238) Unselected CETA Projects (Schedule 141CGR) (1,949,209) (10,580,634) Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,600,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,473) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding 197,459 209,155 Long Term Incentive Program 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments \$703,279,330 \$748,060,153 Regulatory Adjustments: (9,586,220) (10,959,569) Adjust Fling Fees to match revenues (9,586,220) (10,959,569) Adjust Pension Expense to 4 year average (8,935,611) (11,787,606) <td>Low Income Amortization</td> <td>(58,577,499)</td> <td>(54,699,875)</td>	Low Income Amortization	(58,577,499)	(54,699,875)			
Remove Items Recovered Separately: (13,631,606) (13,904,238) Beaver Creek (Schedule 141CGR) (1,949,209) (10,580,634) Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,600,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding 1 1 Long Term Incentive Program 1 9 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments \$ 703,279,330 \$ 748,060,153 Regulatory Adjustments: \$ 9,586,220 (10,959,569) Adjust Filing Fees to match revenues (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add Interest on Customer Deposits 161,822 161,822 Adjust Pe	Green Power Certificates [p]	(2,312,291)	(2,410,892)			
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Unselected CETA Projects (Schedule 141CGR) (1,949,209) (10,580,634) Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,600,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding 5 5 Long Term Incentive Program 197,459 209,155 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) 197,459 209,155 19,260,995 <	Remove Items Recovered Separately:		_			
Wildfire Tracker (Schedule 141WFD) (17,486,582) (18,181,747) Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,600,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding Long Term Incentive Program - - - Payroll Taxes removed above [p] 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments \$ 703,279,330 \$ 748,060,153 Regulatory Adjustments: (9,586,220) (10,959,569) Adjust Filing Fees to match revenues (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average (38,803) (19,344) <	Beaver Creek (Schedule 141CGR)	(13,631,606)	(13,904,238)			
Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB) (10,600,000) (11,700,000) Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding Long Term Incentive Program	Unselected CETA Projects (Schedule 141CGR)	(1,949,209)	(10,580,634)			
Tacoma LNG Facility (Schedule 141LNG) [p] (5,384,273) (5,388,403) Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding Long Term Incentive Program - - Payroll Taxes removed above [p] 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments \$ 703,279,330 \$ 748,060,153 Regulatory Adjustments: - - (9,586,220) (10,959,569) Adjust Filing Fees to match revenues - (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add Increst on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) </td <td>Wildfire Tracker (Schedule 141WFD)</td> <td>(17,486,582)</td> <td>(18,181,747)</td>	Wildfire Tracker (Schedule 141WFD)	(17,486,582)	(18,181,747)			
Colstrip (Schedule 141COL) (27,904,518) (3,366,300) Transportation Electrification Program (Schedule 141TEP) (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding Long Term Incentive Program - - - Payroll Taxes removed above [p] 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments ** 703,279,330 ** 748,060,153 Regulatory Adjustments: ** 40,958,6220 (10,959,569) Adjust Filing Fees to match revenues (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344)	Targeted Electrification Program Pilot Phase 2 (Schedule 141DCARB)	(10,600,000)	(11,700,000)			
Transportation Electrification Program (Schedule 141TEP) [p] (10,102,995) (10,348,828) Add Incremental Items: Participatory Funding Long Term Incentive Program	Tacoma LNG Facility (Schedule 141LNG) [p]	(5,384,273)	(5,388,403)			
Add Incremental Items: Participatory Funding Long Term Incentive Program	Colstrip (Schedule 141COL)	(27,904,518)	(3,366,300)			
Participatory Funding Long Term Incentive Program Payroll Taxes removed above [p] Subtotal Adjustments for Items Recovered Separately Subtotal Before Regulatory Adjustments Regulatory Adjustments: Adjust Filing Fees to match revenues Adjust Bad Debt to 3 year average Add normalized Rate Case Expense Add Interest on Customer Deposits Adjust Pension Expense to 4 year average of payouts Adjust Injuries and Damages to 3 year average Adjust Storm to a 6 year average Subtotal Regulatory Adjustments Page 197,459 Page 209,155 Page 197,459 Page 197,45	Transportation Electrification Program (Schedule 141TEP) [p]	(10,102,995)	(10,348,828)			
Long Term Incentive Program - - Payroll Taxes removed above [p] 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments \$ 703,279,330 \$ 748,060,153 Regulatory Adjustments: 4 4,000,000 (10,959,569) Adjust Filing Fees to match revenues (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Add Incremental Items:					
Payroll Taxes removed above [p] 197,459 209,155 Subtotal Adjustments for Items Recovered Separately (86,861,725) (73,260,995) Subtotal Before Regulatory Adjustments \$ 703,279,330 748,060,153 Regulatory Adjustments: \$ 40 yes \$ 9,586,220 (10,959,569) Adjust Filing Fees to match revenues (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Participatory Funding					
Subtotal Adjustments for Items Recovered Separately Subtotal Before Regulatory Adjustments(86,861,725)(73,260,995)Regulatory Adjustments:703,279,330748,060,153Adjust Filing Fees to match revenues(9,586,220)(10,959,569)Adjust Bad Debt to 3 year average(8,935,611)(11,787,606)Add normalized Rate Case Expense2,826,8002,826,800Add Interest on Customer Deposits161,822161,822Adjust Pension Expense to 4 year average of payouts(11,316,386)(12,350,047)Adjust Injuries and Damages to 3 year average184,554(13,410)Adjust Storm to a 6 year average(38,803)(19,344)Adjust Incentive to 4 year average2,161,242(1,922,108)Subtotal Regulatory Adjustments(24,542,603)(34,063,463)	Long Term Incentive Program	-	-			
Subtotal Before Regulatory Adjustments \$ 703,279,330 \$ 748,060,153 Regulatory Adjustments: (9,586,220) (10,959,569) Adjust Filing Fees to match revenues (8,935,611) (11,787,606) Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Payroll Taxes removed above [p]	197,459	209,155			
Regulatory Adjustments: Adjust Filing Fees to match revenues (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Subtotal Adjustments for Items Recovered Separately	(86,861,725)	(73,260,995)			
Adjust Filing Fees to match revenues (9,586,220) (10,959,569) Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Subtotal Before Regulatory Adjustments	\$ 703,279,330	\$ 748,060,153			
Adjust Bad Debt to 3 year average (8,935,611) (11,787,606) Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Regulatory Adjustments:					
Add normalized Rate Case Expense 2,826,800 2,826,800 Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Adjust Filing Fees to match revenues	(9,586,220)	(10,959,569)			
Add Interest on Customer Deposits 161,822 161,822 Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Adjust Bad Debt to 3 year average	(8,935,611)	(11,787,606)			
Adjust Pension Expense to 4 year average of payouts (11,316,386) (12,350,047) Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Add normalized Rate Case Expense	2,826,800	2,826,800			
Adjust Injuries and Damages to 3 year average 184,554 (13,410) Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Add Interest on Customer Deposits	161,822	161,822			
Adjust Storm to a 6 year average (38,803) (19,344) Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Adjust Pension Expense to 4 year average of payouts	(11,316,386)	(12,350,047)			
Adjust Incentive to 4 year average 2,161,242 (1,922,108) Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Adjust Injuries and Damages to 3 year average	184,554	(13,410)			
Subtotal Regulatory Adjustments (24,542,603) (34,063,463)	Adjust Storm to a 6 year average	(38,803)	(19,344)			
	Adjust Incentive to 4 year average	2,161,242	(1,922,108)			
Total Requested O&M \$ 678,736,728 \$ 713,996,691	Subtotal Regulatory Adjustments	(24,542,603)	(34,063,463)			
	Total Requested O&M	\$ 678,736,728	\$ 713,996,691			