Exh. JL-3C Docket UE-200115 Witness: Jing Liu REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of

PUGET SOUND ENERGY

For an Order Authorizing the Sale of All of Puget Sound Energy's Interests in Colstrip Unit 4 and Certain of Puget Sound Energy's Interests in the Colstrip Transmission System **DOCKET UE-200115**

EXHIBIT TO TESTIMONY OF

Jing Liu

STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Comparison of Colstrip Historical O&M Expense as Compared to Budget, Historical Expenditure on Major Maintenance and Capital Additions

October 2, 2020

CONFIDENTIAL PER PROTECTIVE ORDER – REDACTED VERSION

Comparison of Budget and Actual Cost for Colstrip Units 3 and 4

Operation and Maintenance

Year	Budget	Actual	Difference
2016	XXXXX	XXXXX	XXXXX
2017	XXXXX	XXXXX	XXXXX
2018	XXXXX	XXXXX	XXXXX
2019	XXXXX	XXXXX	XXXXX
Average	XXXXX	XXXXX	XXXXX
Average for One Unit Only	XXXXX	XXXXX	XXXXX

Source: PSE Response to WUTC Staff Data Request No. 22 (R)

Note: PSE's Response to WTUC Staff Data Request No. 28 Attachment A provides Colstrip Units 3&4 O&M data from 2014-2019. The average is \$xxxxx, very close to the average from 2016-2019.

Major Maintenace - Actual Cost - PSE Portion

Plant	Event Date	Actual Cost
Colstrip 1&2	XXXXX	XXXXX
Colstrip 3&4	XXXXX	XXXXX
Average		XXXXX

Source: Liu, Exh. JL-10C in Docket UE-190529.

Capital Additions - Actual Cost - PSE Portion

Year	Units 3 & 4	One Unit
2009	\$ 11,731,220.98	\$ 5,865,610
2010	\$ 5,933,179.11	\$ 2,966,590
2011	\$ 10,448,691.48	\$ 5,224,346
2012	\$ 5,304,393.20	\$ 2,652,197
2013	\$ 14,552,188.70	\$ 7,276,094
2014	\$ 7,404,600.26	\$ 3,702,300
2015	\$ 5,372,467.69	\$ 2,686,234
2016	\$ 18,622,313.67	\$ 9,311,157
2017	\$ 16,784,799.05	\$ 8,392,400
2018	\$ 6,435,836.77	\$ 3,217,918
2019	\$ 4,940,869.18	\$ 2,470,435
Average	\$ 9,775,505.46	\$ 4,887,753

Source: PSE Response to WUTC Staff Data Request No. 28 Attachment C

Docket UE-200115 Puget Sound Energy Application Authorizing Sale of PSE Interest in Colstrip Unit 4

WUTC STAFF DATA REQUEST NO. 022

DR NO.	"CONFIDENTIAL" Material
022	Shaded information in each of Attachment A and Attachment B to Puget Sound Energy's Response to WUTC Staff Data Request is designated as CONFIDENTIAL per Protective Order in Docket UE- 200115.

Docket UE-200115 Puget Sound Energy Application Authorizing Sale of PSE Interest in Colstrip Unit 4

WUTC STAFF DATA REQUEST NO. 022:

Re: Cost Benefit Analysis – Actual and Budgeted O&M

- a. Please provide the most up-to-date Talen's annual O&M budget for Colstrip Units 3 and 4 from 2016 through 2020.
- b. Please provide the actual O&M expense for Colstrip Units 3 and 4 from 2016 through 2019. Please provide major maintenance expense, separately.

Response:

- Attached as Attachment A to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 022 for Talen Montana LLC's ("Talen Montana") annual O&M budgets for Colstrip Units 3 & 4 from 2016 through 2020. The major maintenance (overhauls) represent cash outlay ("out of pocket") costs. Talen Montana does not budget the amortization of major maintenance.
- Attached as Attachment B to PSE's Response to WUTC Staff Data Request No. 022 for the actual O&M expense for Colstrip Units 3 & 4 from 2016 through 2019. Major maintenance is provided separately, but, unlike the budgeted major maintenance amounts in part a to this response, Attachment B to PSE's Response to WUTC Staff Data Request No. 022 depicts the amortization of major maintenance expense from prior periods, amortized over 36 months (i.e., the approved method for accounting and rate making purposes).

Shaded information in each of Attachment A and Attachment B to Puget Sound Energy's Response to WUTC Staff Data Request is designated as CONFIDENTIAL per Protective Order in Docket UE-200115.

Docket UE-200115 Puget Sound Energy Application Authorizing Sale of PSE Interest in Colstrip Unit 4

WUTC STAFF DATA REQUEST NO. 022

DR NO.	"CONFIDENTIAL" Material
022	Shaded information in each of Attachment A and Attachment B to Puget Sound Energy's Response to WUTC Staff Data Request is designated as CONFIDENTIAL per Protective Order in Docket UE- 200115.

Exh. JL-3C Docket UE-200115 Page 5 of 19 REDACTED VERSION

ATTACHMENT A to PSE's Response to WUTC Staff Data Request No. 022

Exh. JL-3C Docket UE-200115 Page 6 of 19 REDACTED VERSION

REDACTED VERSION

Colstrip Plant Units 3 & 4 Business Plan 2016 - 2020

	2016	2017	2018	2019	2020
	Budget	Budget	Budget	Budget	Projection
Net Generation	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
EUF Forced	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
EUF Maintenance	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
EUF Annual Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Capacity Factor- Annual Generation	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Costs (Base)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
High Calcium Lime	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
High Calcium Lime- Water Management	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Water Management- Payment Credit	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Startup Fuel, Diesel	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Pollution Control Taxes	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Mercury Control Chemicals	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Water Treatment Chemicals	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Special Maintenance	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Costs (Overhaul)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Costs (Total)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Management Reserve	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Total w/Reserve	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Costs/MWHR (non-fuel)w/o Reserve	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Coal (tons)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Coal Unit Cost (\$/ton)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Coal Cost (\$)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Cost/MWHR(fuel)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Total Cost/MWHR	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Capital Cost - Sustenance/Discretionary	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Capital Cost - Environmental	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Capital Cost - Regulatory	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Capital Cost - Grand Total	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Base O&M	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Water Treatment Chemicals	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX

Base O&M	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Water Treatment Chemicals	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Special Maintenance	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Production O&M excluding major maint	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
PSE's 25% Share	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
	R				
O&M Costs (Overhaul)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
O&M Special Maintenance	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Major Maintenance Expense	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
PSE's 25% Share	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX

Docket UE-200115 Puget Sound Energy Application Authorizing Sale of PSE Interest in Colstrip Unit 4

WUTC STAFF DATA REQUEST NO. 022

DR NO.	"CONFIDENTIAL" Material
022	Shaded information in each of Attachment A and Attachment B to Puget Sound Energy's Response to WUTC Staff Data Request is designated as CONFIDENTIAL per Protective Order in Docket UE- 200115.

Exh. JL-3C Docket UE-200115 Page 8 of 19 REDACTED VERSION

ATTACHMENT B to PSE's Response to WUTC Staff Data Request No. 022

Shaded information is designated as CONFIDEN	ΓIAL
per Protective Order in Docket UE-200115	

Colstrip 3&4				
Year	Total O&M	Major Maint (Amortization)	Total O&M & Maj Maint	
2016	XXXXXXX	XXXXXXX	XXXXXXX	
2017	XXXXXXX	XXXXXXX	XXXXXXX	
2018	XXXXXXX	XXXXXXX	XXXXXXX	
2019	XXXXXXX	XXXXXXX	XXXXXXX	

Docket UE-200115 Puget Sound Energy Application Authorizing Sale of PSE Interest in Colstrip Unit 4

WUTC STAFF DATA REQUEST NO. 028

DR NO.	"CONFIDENTIAL" Material
028	Shaded information in Attachment A to Puget Sound Energy's Response to WUTC Staff Data Request No. 028 is designated as CONFIDENTIAL per Protective Order in Docket UE-200115.

Docket UE-200115 Puget Sound Energy Application Authorizing Sale of PSE Interest in Colstrip Unit 4

WUTC STAFF DATA REQUEST NO. 028:

Re: Colstrip Plant Historical Cost

Please provide the following information allocated for each Colstrip Unit, respectively for each year from 2009 to 2019:

- a. Fixed operation and maintenance expenses;
- b. Variable expenses (dispatch cost);
- c. Major maintenance (overhaul);
- d. Capital expenditure.

If there were extraordinary events that caused a big variation in costs for any particular year, please make a note.

Response:

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 028 as overbroad and unduly burdensome due to temporal scope, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections and subject thereto, PSE responds as follows:

PSE's accounting data is consistent with the definitions of fixed and variable costs used in the Power Cost Adjustment ("PCA") Mechanism; therefore, PSE's Response to WUTC Staff Data Request No. 028 uses the same distinctions between fixed and variable costs. Accounting data is available for Colstrip Units 3 & 4 combined, rather than for each unit separately.

- Attached as Attachment A to PSE's Response to WUTC Staff Data Request
 No. 028 is a summary of O&M expense for Colstrip Units 3 & 4 from January 1,
 2009, through December 31, 2019. One-time credits are detailed in column (C) of
 Attachment A to PSE's Response to WUTC Staff Data Request No. 028.
- Attached as Attachment B to PSE's Response to WUTC Staff Data Request No. 028 is a summary of variable costs related to Colstrip Units 3 & 4 from January 1, 2009, through December 31, 2019. This includes coal fuel costs only.

Exh. JL-3C Docket UE-200115 Page 12 of 19 REDACTED VERSION

- c. Please see Attachment A to PSE's Response to WUTC Staff Data Request No. 028 for major maintenance associated with Colstrip Units 3 & 4. PSE did not report major maintenance expense separately from base O&M prior to the 2014 Power Cost Only Rate Case filing. Beginning in 2015, PSE amortized major maintenance events over 36 months. These amortized major maintenance events are presented separately from the non-major maintenance O&M in column (B) of Attachment A to PSE's Response to WUTC Staff Data Request No. 028. Additionally, the cash outlay for the major maintenance event, including overhaul, is presented in column (E) of Attachment A to PSE's Response to WUTC Staff Data Request No. 028.
- d. Attached as Attachment C to PSE's Response to WUTC Staff Data Request No. 028, please find the capital expenditures for Colstrip Units 3 & 4 from January 1, 2009, through December 31, 2019. PSE is unaware of any extraordinary events during this time period. Large capital expenditures during this period are likely due to the capital additions associated with major maintenance events.

Shaded information in Attachment A to PSE's Response to WUTC Staff Data Request No. 028 is designated as CONFIDENTIAL per Protective Order in Docket UE-200115.

ATTACHMENT A to PSE's Response to WUTC Staff Data Request No. 028 (Omitted)

ATTACHMENT B to PSE's Response to WUTC Staff Data Request No. 028 (Omitted)

Exh. JL-3C Docket UE-200115 Page 13 of 19 REDACTED VERSION

Year	Ca	apital Additions
2009	\$	11,731,220.98
2010	\$	5,933,179.11
2011	\$	10,448,691.48
2012	\$	5,304,393.20
2013	\$	14,552,188.70
2014	\$	7,404,600.26
2015	\$	5,372,467.69
2016	\$	18,622,313.67
2017	\$	16,784,799.05
2018	\$	6,435,836.77
2019	\$	4,940,869.18
Grand Total	\$	107,530,560.09

Summary of Colstrip Units 3 & 4 Capital Additions 2009-2019

Note: Two supporting tabs in the original response: "Colstrip 3&4 plant additions" and "PP SS" are omitted here.

Exh. JL-3C Docket UE-200115 Page 14 of 19 REDACTED VERSION

The following pages are CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET UE-200115

Exh. JL-10C Dockets UE-190529/UG-190530 and UE-190274/UG-190275 (consolidated) Witness: Jing Liu REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	DOCKETS UE-190529 and UG-190530 (consolidated)
Complainant,	
v.	
PUGET SOUND ENERGY, Respondent.	
In the Matter of the Petition of PUGET SOUND ENERGY For an Order Authorizing Deferral Accounting and Ratemaking Treatment for Short-life UT/Technology Investment	DOCKETS UE-190274 and UG-190275 (consolidated)

EXHIBIT TO TESTIMONY OF

Jing Liu

STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Colstrip Major Maintenance Budget v. Actual v. In Rates

November 22, 2019

CONFIDENTIAL PER PROTECTIVE ORDER – REDACTED VERSION

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

WUTC STAFF DATA REQUEST NO. 167

DR NO.	"CONFIDENTIAL" Material
167	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 WUTC Staff Data Request No. 167.

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

WUTC STAFF DATA REQUEST NO. 167:

Re: Major Maintenance Cost – comparison to 2017 GRC level

Please refer to Mr. Roberts' workpaper "RJR_WB_C_2019_GRC_Production_OM_WorkPaper_Rvn17Apr(C)," tab Major Maintenance (C)."

For each of the major maintenance events listed in the tab, please provide an additional column to show the total amortization amount (event cost) that was built into rates in the 2017 GRC (Column "Amt to Amort as Booked" in the 2017 GRC workpaper).

Response:

Please see Attachment A to Puget Sound Energy's ("PSE") Response to WUTC Staff Data Request No. 167 for the detail of amortization amounts built into rates in the 2017 general rate case. In Attachment A, this information has been inserted to the right of the 2019 general rate case rate year amortization.

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 WUTC Staff Data Request No. 167.

Exh. JL-3C Docket UE-200115 Page 18 of 19 REDACTED VERSION

ATTACHMENT A to PSE's Response to WUTC Staff Data Request No. 167

Exh. JL-3C Docket UE-200115 Page 19 of 19 REDACTED VERSION

PSE Power Plants Major Maintenance Cost (Actual versus Built in Rates)

Plant	Event	Event Date	Amt to Amort as Booked	Actual Amort Begin	Amort Period as Booked	Amort End as Booked	Monthly Amortization	Months Amort in Rate Yr.	Rate Year Amortization	Test Year Amortization as booked	Adjustment to test Year (rounded to nearest \$10)	Event Cost Embedded in 2017 GRC	Over (under) Estimate	Over (under) Estimate Percent
Colstrip 1&2	Colstrip Unit #2 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Colstrip 1&2	Colstrip Unit #1 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Colstrip 1&2	Colstrip Unit #1 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Colstrip 1&2	Colstrip Unit #2 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Colstrip 3&4	Colstrip Unit #3 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Colstrip 3&4	Colstrip Unit #4 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Colstrip 3&4	Colstrip Unit #3 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Colstrip 3&4	Colstrip Unit #4 Outage	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Encogen	ENC U1 Major Insp, CT Generator Major Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Encogen	ENC U2 Major Insp; CT Gen Maj Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Encogen	ENC Unit #3 HGP Insp, CT Gen Major Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Encogen	ENC Steam Turbine Major Insp/Gen Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Ferndale	FRNDL Steam Turbine Major/ST Gen Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Freddie 1	FDY1 CT Major (a)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Freddie 1	FDY1 ST Summary (a)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Frederickson	FRE Unit 2 Mod HGP Insp/ CT Gen Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Frederickson	FRE Unit #1 CT HGP Insp/ CT Gen Insp (a)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Fredonia 1-4	FRA U2 Major Insp/ GT Gen Major Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Fredonia 1-4	FRA U1 Major Inspection	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Goldendale	GLD Steam Turbine Major Inspection	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Goldendale	GLD Steam Turbine Summary Inspection.	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Goldendale	GLD Major Inspection	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Goldendale	GLD Steam Turbine Summary Inspection. (a)	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Mint Farm	MTF Steam Turbine Full Scale Inspection	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Mint Farm	MTF Steam Turbine Summary Inspection	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Mint Farm	MTF Major Inspection	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Mint Farm	MTF Steam Turbine Summary Inspection	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Mint Farm	MTF ST partial Full-Scale Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Sumas	SMS CT Major Insp, CT Generator Major Insp	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Sumas	SMS Steam Turbine Major Insp, ST Generator Insp (a)	XXXXXX	XXXXXX	XXXXXX	xxxxxx	XXXXXX	xxxxxx	xxxxxx	XXXXXX	XXXXXX	xxxxxx	xxxxxx	XXXXXX	xxxxxx
Whitehorn	WHN Unit #2 Compressor Rebld	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX
Whitehorn	WHN Unit #3 Generator Major	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX	XXXXXX

Notes:

Data in Column "Amort Period as Booked" (Event Cost proposed in 2019 GRC) is from Mr. Ronald Roberts' Workpaper, "RJR_WB_C_2019_GRC_Production_OM_WorkPaper_Rvn17Apr(C)" in UE-190529. Data in Column "Event Cost Embedded in 2017 GRC" is from Mr. Ronald Roberts' Exhibit RJR-26C in UE-170033.

Source: PSE Response to UTC Staff Data Request No. 167