

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION
COMMISSION

BELLINGHAM COLD STORAGE COMPANY)	
and GEORGIA-PACIFIC WEST, INC.,)	
) NO. UE-001014
Complainants,)	
) MOTION TO COMPEL
v.)	
)
PUGET SOUND ENERGY,)	
)
Respondent.)	

Motion

Georgia-Pacific West, Inc., moves for an order compelling Puget Sound Energy to respond fully to Complainant's first discovery request, in the following particulars:

1. By reporting all electric purchase and sale transactions, as requested, rather than just those at Mid-Columbia, and to do so in electronic format, as requested.
2. By naming the counterparties on all transactions, as requested.

Discussion

The undersigned has discussed this Motion with PSE counsel, Mark Quehrn. Mr. Quehrn reports that PSE will stand on its filed objections, which are extensive. Mr. Quehrn has said that PSE will provide future data in both electronic and analogue formats. Electronic format is essential to perform analysis without inordinate delay.

Mr. Quehrn says the counterparties to the reported transactions are "confidential, irrelevant, and not required for Dow Jones reporting." Our response is that there is a protective order to protect PSE

confidences, identification of the counterparties will permit us to analyze the transactions for collusion or suspicious patterns of trading inimical to fair dealing; and the fact that Dow Jones does not require counterparty identification is not material to our inquiry.

Request

Argument by teleconference, if argument is necessary.

DATED: August 2, 2000.

Respectfully submitted,

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Georgia-Pacific West, Inc.