

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

WSHVACCA DATA REQUEST NO. 024

WSHVACCA DATA REQUEST NO. 024:

Please provide the name, and relationship to Puget Sound Energy, of any person who on behalf of Puget Sound Energy made contact with any witness for Washington State Heating, Ventilation and Air Conditioning Contractors Association in the current adjudication, since June 7, 2016.

Response:

Puget Sound Energy ("PSE") objects to WSHVACCA Data Request No. 024 as overbroad and not reasonably calculated to lead to the discovery of admissible evidence. PSE objects further to the extent WSHVACCA Data Request No. 024 seeks information that is protected by the attorney client privilege or attorney work product doctrine. WSHVACCA Data Request No. 024 is also vague and ambiguous.

Without waving these objections, and subject thereto, it appears that during the course of Keystone Strategy's research of potential market consultants, it made contact with one of WSHVACCA's witnesses, Steven J. Krecker. At the time, Keystone was unaware that Mr. Krecker had filed testimony on behalf of WSHVACCA and the contact was entirely inadvertent. Keystone's activities were conducted under the direction of Jeff Marowits, a partner at Keystone Strategy. Julia Henkels, a consultant at Keystone Strategy, made the actual contact with Mr. Krecker.