

PSE Data Request No. 048 to SMACNA-WW:

Produce all documents supporting or providing authority for the proposition contained in the Prefiled Direct Testimony of Brian Fluetsch that he “do[es] not perceive a demand for [residential leases] in the area we serve.”

(Refer to page 5 of the Prefiled Direct Testimony of Brian Fluetsch)

Response:

SMACNA-WW has no such documents.

SMACNA-WW further objects to this request to the extent it asks, or could be interpreted to ask, for information not in the possession, custody, or control of SMACNA-WW. Sunset Air is not a party to this proceeding. Brian Fluetsch is a witness offered by SMACNA-WW and also is not a party to this proceeding. To the extent his testimony on this topic is expert opinion testimony, PSE may only seek information pursuant to CR 26(b)(5).

Notwithstanding these objections, and without waiving them, SMACNA-WW responds as follows:

Brian Fluetsch has no responsive documents.

Witnesses knowledgeable about, and who can respond to, questions concerning this response: Julie Muller-Neff and Brian Fluetsch.

Prepared by: Jeffrey D. Goltz, 360-528-3026
Dated: June 21, 2016