

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: June 21, 2016
DOCKETS: UE-151871/UG-151872
REQUESTER: Puget Sound Energy

WITNESS: Bradley Cebulko
RESPONDER: Bradley Cebulko
TELEPHONE: (360) 664-1309

REQUEST NO. 52:

Produce all documents relating to the professional standards for creating, preparing, and administering a customer survey, such as the survey administered on behalf of PSE by Cocker Fennessy in January 2016, and identify any professional market research companies, entities, or individuals consulted regarding the Cocker Fennessy survey, in preparing WUTC Staff's Prefiled Direct Testimony.

RESPONSE:

Staff objects to PSE Data Request No. 52 as overly broad and unduly burdensome. The request also duplicates previous requests for documents and analyses undertaken by Staff. As one of many examples, please refer to PSE Data Request No. 2. Without waiving these objections, Staff provides the following response:

Staff's testimony articulates Staff's position on PSE's customer survey. See Mr. Cebulko's direct testimony, section V.B.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: May 11, 2016
DOCKETS: UE-151871/UG-151872
REQUESTER: Puget Sound Energy

WITNESS: Bradley Cebulko
RESPONDER: Bradley Cebulko
TELEPHONE: (360) 664-1309

REQUEST NO. 2: Provide all documents or analysis undertaken by or on behalf of WUTC Staff, or any documents or analyses relied on by WUTC Staff, or any other documents or analysis, relating to PSE's proposed Equipment Lease Program.

RESPONSE: Objection: Commission Staff objects to this PSE Data Request No. 2 as overly broad and unduly burdensome as PSE's definition of "Analysis or analyses" means "any reviews, reports, studies, tests, computations, comparisons, calculations, estimates, appraisals, assessments, valuations, inquiries, investigations, evaluations or inquiries undertaken by a person, including any formal or informal draft or final analyses and all documents related to such analyses," and PSE's definition of "Document" means, "without limitation, all tangible preservations of information, including writings, recordings, and photographs, along with all documents or electronically stored information, information preserved on computers, and any non-identical copies (whether different from the originals because of notes made on such copies, because such copies were sent to different individuals, or for any other reason) and drafts." Commission Staff also objects on the basis that PSE seeks information that is confidential work product and/or protected by attorney-client privilege. In addition, the information sought is obtainable from some other source that is more convenient, less burdensome, and less expensive, namely PSE's own records. Without waiving such objections, Staff provides the following response:

Please see all documents filed in this proceeding, as well as all responses submitted by all parties to all data requests submitted by all parties in this proceeding.

Please also see the following attachments:

- A. Attachment A – Finance Options (This document was provided to staff as an attachment to an email from a stakeholder during the open meeting process.)
- B. Attachment B – Finance Options II (This document was provided to staff as an attachment to an email from a stakeholder during the open meeting process.)
- C. Attachment C – NWPCC 7th Power Plan Chapter 14 Demand Response
- D. Attachment D – NWPCC 7th Power Plan Appendix J Demand Response
- E. Attachment E – NWPCC Assessing Demand Response Program Potential for the 7th Power Plan
- F. Attachment F – U-9621 Final Order
- G. Attachment G – Staff Witness Ramirez UG-920840
- H. Attachment H – Fourth Supplemental Order UG-920840
- I. Attachment I – Northwest Natural Schedule G, Energy Efficiency Services and Programs UG-143895
- J. Attachment J – PSE UE-152058 Cost-Effectiveness Tests
- K. Attachment K – PSE U-9621 Proposed Order