

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**WUTC STAFF DATA REQUEST NO. 093**

**WUTC STAFF DATA REQUEST NO. 093:**

Please provide the specific citation to Mr. Cebulko's testimony where he states that there are absolutely no energy efficiency savings from the proposed program, even if the program replaced even just one existing system with a high efficiency system, as stated in LYN-1T 23:18- 24:2.

**Response:**

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 093 as it inaccurately paraphrases the testimony of Ms. Norton. Without waiving these objections, and subject thereto, PSE responds as follows:

Mr. Cebulko does not specifically state that there are "absolutely no energy efficiency savings," but does state on page 6, lines 14-15 of his testimony, that "PSE's proposed leasing service is not designed to deliver public benefits to its entire system or customer base." Additionally on page 35, at lines 18-19, he asserts, without supporting evidence, that the "leasing program is unlikely to stimulate very little in the way of energy-efficient products." These unsupported statements, coupled with positions Staff has taken throughout this case, were basis enough for PSE to surmise that Mr. Cebulko believed that there are no energy efficiency savings that can result from the proposed program. However, based on the question, it appears that Staff is now conceding that the program will yield energy efficiency savings, as PSE has demonstrated throughout this case.