

EXHIBIT LIST

Dockets UE-120436 and UG-120437

and

Dockets UE-110876 and UG-110877 (Phase Two)

(Consolidated)

HEARING DATES: November 29-30, 2012

PARTY: NWIGU				
WITNESS: Michael C. Deen				
MCD-10T	Michael C. Deen			Prefiled Response Testimony of Michael C. Deen (13 pp.) (9/19/12)
MCD-11	Michael C. Deen			Qualification Statement of Michael C. Deen (2 pp.) (9/19/12)
MCD-12	Michael C. Deen			NWIGU Cost of Service Study (4 pp.) (9/19/12)
CROSS-EXAMINATION EXHIBITS				
MCD-15 CX	Public Counsel			NWIGU Response to Public Counsel Data Request No. 2

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

WUTC V. AVISTA
Docket Nos. UE-120436 and UG-120437

THE NORTHWEST INDUSTRIAL GAS USERS' ("NWIGU") RESPONSE TO
PUBLIC COUNSEL DATA REQUEST NO. 2 TO NWIGU

- PC-2 Regarding the recently announced employee severance incentive program,
please answer/provide the following:
- a. When did NWIGU first become aware of the severance program?
 - b. Provide the first correspondence wherein NWIGU first became aware of the severance program. If the first correspondence was verbal, discuss how, what and when such information was relayed.
 - c. Did NWIGU consider savings expected to be realized from the severance program when entering into the Settlement Stipulation in this docket? If yes, please discuss and describe how and to what extent such savings may have been considered in NWIGU's decision to enter into the Settlement Stipulation. Provide any calculations or analyses undertaken. If no, please explain why such impacts were ignored in the analysis process.

NWIGU'S RESPONSE TO PUBLIC COUNSEL DATA REQUEST NO. PC-2 TO
NWIGU:

NWIGU objects to this data request because it is vague and ambiguous, and because it is irrelevant to the matters at issue in this docket. NWIGU further objects to this data request because it seeks information protected by the attorney-client privilege and information protected from discovery as confidential settlement communications. Without waiving these objections, NWIGU responds to this data request as follows:

- a. NWIGU has no documentation or other available information demonstrating what specific date NWIGU first became aware of the severance program. NWIGU likely first became aware of the program as a result of this data request from Public Counsel.
- b. NWIGU has no documentation or other available information demonstrating what specific date NWIGU first became aware of the severance program. NWIGU

likely first became aware of the program as a result of this data request from Public Counsel.

- c. No. This data request post-dates the stipulation. Moreover, NWIGU typically does not have the resources required to analyze every proposed adjustment in a general rate case.