

Exhibit No. EH-2
Docket U-180680
Witness: Erin Hutson

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. U-180680

TESTIMONY OF

ERIN HUTSON

LABORERS INTERNATIONAL UNION OF AMERICA

Exhibit EH-2

February 8, 2019

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket U-180680
Puget Sound Energy
Sale of Non-Controlling Interest in Puget Holdings LLC**

WNIDCL DATA REQUEST NO. 006:

For each year during the period from 2007 to the present, provide the: (a) total amount expended by PSE on construction labor; and (b) proportion of that total amount spent on Construction Contractors or Contractor Personnel. Provide all supporting data (including worksheets).

Response:

Puget Sound Energy (“PSE”) objects to WNIDCL Data Request No. 006 as beyond the scope of WNIDCL’s participation in this matter as provided by the WUTC in Prehearing Order 03, paragraph 17, which limits WNIDCL’s participation as follows:

WNIDCL will be limited to matters specifically addressing the safety and reliability of service to customers where its members are actually involved in the provision of such service. We expressly decline to consider any labor relations matters in this proceeding covered by the collective bargaining agreement. In the event it becomes clear later in the proceeding that WNIDCL’s continued participation is not in the public interest, the Commission has the authority to dismiss WNIDCL as an intervenor.

PSE also objects to WNIDCL Data Request No. 006 as overbroad and unduly burdensome as it requests information dating back to 2007, and not reasonably calculated to lead to the discovery of admissible evidence as it seeks information that is irrelevant and beyond the scope of this proceeding.

Without waiving these objections and subject thereto, PSE provides the information below for the last five years spanning all construction-related activities (2014-2018 year-to-date).

<i>Source</i>	2014	2015	2016	2017	2018
PSE Labor	62,552,752	73,203,596	85,223,139	104,543,953	107,572,127
Contractor/Outside Service	287,423,484	324,001,609	360,903,846	614,207,827	546,579,936
Total	349,976,236	397,205,205	446,126,985	718,751,780	676,903,466

PSE Labor	18%	18%	19%	15%	16%
Contractor/Outside Service	82%	82%	81%	85%	84%
Total	100%	100%	100%	100%	100%