

**Exhibit DTA-24**  
*PSE Response to IBEW Data Request No. 016,*  
*Attachment A (Apprentices by Department)*

**TESTIMONY OF**

**D. Timothy Arnold**

**In Opposition to the Multiparty Settlement Stipulation on Behalf of IBEW 77**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**IBEW LOCAL 77 DATA REQUEST NO. 016**

**IBEW LOCAL 77 DATA REQUEST NO. 016**

Please identify the total number of apprentices and helpers by department at PSE for each year since 2010.

**Response:**

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 016 as beyond the scope of IBEW Local 77's participation in this matter as provided by the WUTC in Prehearing Order 03, paragraph 23, which limits IBEW Local 77's participation as follows:

IBEW . . . 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. However, in the event it becomes clear later in the proceeding that either UA Local 32's or IBEW's continued participation is not in the public interest, the Commission has authority to dismiss either, or both, as an intervenor.

In particular, the WUTC in Prehearing Order 03, paragraph 22, identified topics that were outside of the Commission's review, such as what is requested in IBEW Local 77 Data Request No. 016:

As discussed above, employment issues such as workplace changes, labor contracts, wages, hours, and staffing are outside the Commission's purview.

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 016 as overbroad because it exceeds the narrow scope of this proceeding and is not likely to lead to the discovery of evidence relevant to the possible harms associated with the proposed transactions. Given that discovery in this proceeding must be "narrowly defined and focused on the proposed transaction," (Docket U-180680, Order 01 at 8), information regarding the total of number of apprentices and helpers by department at Puget Sound Energy ("PSE") each year since 2010 is not reasonably probative for consideration of the proposed transactions.

Each of the Joint Applicants also objects to IBEW Local 77 Data Request No. 016 as overbroad and unduly burdensome as it requests information for the past nine years.

Subject to and notwithstanding these objections, the Joint Applicants respond as follows.

Attached as Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 016 is an MS Excel spreadsheet that lists the number of apprentices and helpers by department at PSE for each year (as of December 31 of each such year) since 2010. Please note that employee names have been redacted from Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 016.

**ATTACHMENT A to the  
Joint Applicants' Response to  
IBEW Local 77 Data Request No. 016**

**U-180680 Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 016** Page 4 of 4

Please identify the total number of apprentices and helpers by department at PSE for each year since 2010.

Sum of Head Count	Column Labels									
Row Labels	2010	2011	2012	2013	2014	2015	2016	2017	2018	
Baker River Generation	5	5	4	2	2	2	2	3	3	
Apprentice	2	2	2							1
Helper	3	3	2	2	2	2	2	3	2	
Electric Meter Ops	5	6	4	5	4	4	5	7	6	
Apprentice	5	6	4	5	4	4	5	7	6	
Electron	7	5	4							
Apprentice	2	2	2							
Helper	5	3	2							
Encogen	1	1	2	2	1	2				1
Apprentice		1	2	2	1	2				
Helper	1									1
Fredonia Turbine	2									
Helper	2									
Goldendale							1	1	1	
Apprentice							1	1	1	
Meter Network Services					15	7	18	13	8	
Helper					15	7	18	13	8	
Mint Farm		1	1	1						
Apprentice		1	1	1						
Snoqualmie Hydro	1	1	2							
Apprentice	1	1	1							
Helper			1							
Substation Ops	21	23	22	20	19	20	24	24	20	
Apprentice	17	15	14	14	12	14	16	19	19	
Helper	4	8	8	6	7	6	8	5	1	
Sumas	1	1								
Apprentice	1	1								
White River	1									
Helper	1									
<b>Grand Total</b>	<b>44</b>	<b>43</b>	<b>39</b>	<b>30</b>	<b>41</b>	<b>35</b>	<b>50</b>	<b>48</b>	<b>39</b>	