

Exhibit No. EH-11
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-11

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. 017:

Describe PSE's role in training personnel for traffic control contractors, or ensuring that contractors retained by PSE employ adequately trained personnel, and provide copies of any and all training documents in PSE's possession regarding training for traffic control personnel.

Response:

Puget Sound Energy ("PSE") does not perform any role in training personnel for traffic control contractors. PSE's Service Providers ("SPs") utilize a combination of in-house employees and subcontractors to perform flagging. PSE's SP contracts require that only fully qualified and properly trained personnel are used in the performance of any work, which includes traffic control services.

PSE SPs that use flaggers are as follows:

- Potelco: Electric construction
- InfraSource: Gas construction
- AA Asphaltting: Hard Surface Restoration
- Asplundh Tree Expert Co.: Vegetation Management
- HydroMax USA: Sewer Inspection