

Exhibit DTA-21

*PSE Response to IBEW Data Request No. 023,
Attachment A (PSE Worst Performing Circuits List)*

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. 023

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Please identify the electrical circuits with the worst service reliability (highest frequency of outages) over the last ten years, including the number of outages and the length of each outage.

Response:

Each of the Joint Applicants object to IBEW Local 77 Data Request No. 023 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.

Each of the Joint Applicants also object to IBEW Local 77 Data Request No. 023 as not likely to lead to the discovery of evidence relevant to the possible harms associated with the Proposed Transactions and as overbroad and unduly burdensome because it requests information for the past ten years.

Without waiving these objections and subject thereto, Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 023 contains information for Puget Sound Energy ("PSE") electrical circuits that were designated by PSE in 2017 as a "worst performing circuit." The data relating to those circuits provided in this response covers the 2014 to 2018-time period.

**ATTACHMENT A to
the Joint Applicants' Response to
IBEW Local 77 Data Request No. 023**

| Cumulative Number of Outages 2014-2018 | | | |
|--|---------|-----|-------|
| Circuit | Non-MED | MED | Total |
| AIR-23 | 131 | 45 | 176 |
| ALG-12 | 117 | 30 | 147 |
| ALG-15 | 262 | 78 | 340 |
| AVO-15 | 126 | 15 | 141 |
| BCH-15 | 70 | 18 | 88 |
| BDI-13 | 93 | 41 | 134 |
| BEL-26 | 20 | 1 | 21 |
| BIG-15 | 198 | 57 | 255 |
| BLA-12 | 34 | 11 | 45 |
| BLA-13 | 205 | 60 | 265 |
| BLU-16 | 159 | 28 | 187 |
| BLU-17 | 143 | 27 | 170 |
| BRS-24 | 226 | 64 | 290 |
| BRW-13 | 81 | 8 | 89 |
| CEK-14 | 107 | 37 | 144 |
| CHA-13 | 94 | 15 | 109 |
| CHA-15 | 95 | 25 | 120 |
| CHI-12 | 346 | 112 | 458 |
| CHR-22 | 65 | 38 | 103 |
| CHR-23 | 44 | 19 | 63 |
| CLE-11 | 159 | 8 | 167 |
| COT-13 | 191 | 52 | 243 |
| COT-15 | 83 | 40 | 123 |
| CTR-22 | 78 | 5 | 83 |
| DGR-15 | 102 | 37 | 139 |
| DUV-12 | 181 | 34 | 215 |
| DUV-15 | 245 | 57 | 302 |
| ELD-25 | 170 | 44 | 214 |
| ELD-27 | 109 | 35 | 144 |
| ETN-13 | 164 | 7 | 171 |
| EVE-13 | 13 | - | 13 |
| FAL-15 | 173 | 40 | 213 |
| FCR-14 | 22 | 9 | 31 |
| FLD-12 | 202 | 64 | 266 |
| FLD-13 | 161 | 60 | 221 |
| FLD-15 | 170 | 31 | 201 |
| FNW-16 | 194 | 50 | 244 |
| FNW-17 | 268 | 80 | 348 |
| FRA-12 | 159 | 82 | 241 |
| FRA-13 | 165 | 75 | 240 |
| FRA-15 | 152 | 76 | 228 |
| FRA-16 | 163 | 57 | 220 |
| FRG-24 | 147 | 32 | 179 |
| GAR-16 | 63 | 16 | 79 |
| GBK-13 | 165 | 55 | 220 |

| Cumulative Number of Outages 2014-2018 | | | |
|--|---------|-----|-------|
| Circuit | Non-MED | MED | Total |
| GOO-15 | 5 | 2 | 7 |
| GRI-13 | 192 | 43 | 235 |
| GRI-16 | 185 | 30 | 215 |
| GRV-15 | 71 | 14 | 85 |
| GWR-13 | 95 | 20 | 115 |
| GWR-16 | 139 | 18 | 157 |
| HAM-15 | 170 | 57 | 227 |
| HAP-16 | 159 | 35 | 194 |
| HKX-16 | 202 | 54 | 256 |
| HOB-15 | 232 | 45 | 277 |
| HOB-16 | 176 | 55 | 231 |
| HYA-13 | 67 | 5 | 72 |
| ING-13 | 113 | 40 | 153 |
| ING-15 | 205 | 46 | 251 |
| KEN-12 | 199 | 98 | 297 |
| KIN-24 | 264 | 96 | 360 |
| KNM-23 | 121 | 29 | 150 |
| KNM-26 | 138 | 20 | 158 |
| KNO-11 | 32 | - | 32 |
| LEA-17 | 33 | 6 | 39 |
| LGY-12 | 140 | 50 | 190 |
| LGY-15 | 52 | 20 | 72 |
| LGY-16 | 288 | 95 | 383 |
| LLS-17 | 65 | 11 | 76 |
| LLT-13 | 76 | 16 | 92 |
| LMD-15 | 76 | 6 | 82 |
| LOL-21 | 159 | 71 | 230 |
| LOL-23 | 91 | 35 | 126 |
| LON-17 | 172 | 36 | 208 |
| LON-25 | 138 | 31 | 169 |
| LTA-17 | 43 | 19 | 62 |
| LTA-18 | 112 | 24 | 136 |
| LUH-14 | 188 | 57 | 245 |
| LWS-14 | 52 | 13 | 65 |
| MAN-15 | 85 | 26 | 111 |
| MCA-15 | 29 | 17 | 46 |
| MIL-17 | 214 | 74 | 288 |
| MIL-22 | 85 | 46 | 131 |
| MIL-23 | 132 | 64 | 196 |
| MKI-17 | 96 | 14 | 110 |
| MOT-14 | 89 | 28 | 117 |
| MVW-13 | 137 | 34 | 171 |
| MVW-17 | 51 | 7 | 58 |
| NLM-15 | 68 | 12 | 80 |
| NUG-26 | 351 | 150 | 501 |

| Cumulative Number of Outages 2014-2018 | | | | |
|--|---------|-----|-------|--|
| Circuit | Non-MED | MED | Total | |
| ORC-13 | 70 | 12 | 82 | |
| ORT-22 | 137 | 26 | 163 | |
| PAT-15 | 164 | 45 | 209 | |
| PGA-12 | 134 | 48 | 182 | |
| PGA-13 | 172 | 71 | 243 | |
| PGA-16 | 18 | 4 | 22 | |
| PIK-21 | 83 | 26 | 109 | |
| PMA-12 | 158 | 67 | 225 | |
| POU-13 | 91 | 45 | 136 | |
| POU-15 | 166 | 88 | 254 | |
| PRI-13 | 191 | 51 | 242 | |
| PTR-14 | 172 | 31 | 203 | |
| PTR-16 | 74 | 11 | 85 | |
| RAI-13 | 165 | 34 | 199 | |
| SEM-13 | 20 | 8 | 28 | |
| SEQ-16 | 61 | 2 | 63 | |
| SHD-18 | 243 | 61 | 304 | |
| SHE-16 | 56 | 9 | 65 | |
| SIL-13 | 90 | 51 | 141 | |
| SIL-15 | 329 | 102 | 431 | |
| SIL-16 | 151 | 37 | 188 | |
| SIN-25 | 96 | 30 | 126 | |
| SKE-22 | 92 | 50 | 142 | |
| SKY-23 | 157 | 8 | 165 | |
| SKY-25 | 111 | 21 | 132 | |
| SLA-16 | 175 | 41 | 216 | |
| SME-12 | 97 | 23 | 120 | |
| SNQ-13 | 9 | 6 | 15 | |
| SNQ-17 | 125 | 35 | 160 | |
| SOO-25 | 136 | 35 | 171 | |
| SUM-21 | 211 | 70 | 281 | |
| SWD-13 | 98 | 40 | 138 | |
| SWI-15 | 82 | 9 | 91 | |
| TOL-15 | 206 | 60 | 266 | |
| VAS-12 | 295 | 122 | 417 | |
| VAS-13 | 318 | 123 | 441 | |
| VAS-23 | 286 | 77 | 363 | |
| WAY-15 | 45 | 28 | 73 | |
| WIN-12 | 119 | 44 | 163 | |
| WIN-13 | 108 | 51 | 159 | |
| WIN-15 | 121 | 47 | 168 | |
| WLS-16 | 176 | 37 | 213 | |
| WOB-23 | 133 | 48 | 181 | |
| WOL-23 | 46 | 6 | 52 | |
| YEL-27 | 93 | 16 | 109 | |

| 3 letter code | Substation Name |
|----------------------|------------------------|
| AIR | AIRPORT |
| ALG | ALGER |
| AVO | AVONDALE |
| BCH | BIRCH BAY |
| BDI | BLACK DIAMOND |
| BEL | BELMORE |
| BIG | BIG ROCK |
| BLA | BLAINE |
| BLU | BLUMAER |
| BRS | BAKER RIVER SW |
| BRW | BURROWS BAY |
| CEK | CENTRAL KITSAP |
| CHA | CHAMBERS |
| CHI | CHICO |
| CHR | CHRISTENSENS CORNER |
| CLE | CLE ELUM |
| COT | COTTAGE BROOK |
| CTR | CHRISTOPHER |
| DGR | DIERINGER |
| DUV | DUVALL |
| ELD | ELD INLET |
| ETN | EASTON |
| EVE | EVERGREEN |
| FAL | FALL CITY |
| FCR | FOUR CORNERS |
| FLD | FREELAND |
| FNW | FERNWOOD |
| FRA | FRAGARIA |
| FRG | FRIENDLY GROVE |
| GAR | GARDELLA |
| GBK | GREENBANK |
| GOO | GOODES CORNER |
| GRI | GRIFFIN |
| GRV | GRAVELLY LAKE |
| GWR | GREENWATER |
| HAM | HAMILTON |
| HAP | HAPPY VALLEY |
| HKX | HICKOX |
| HOB | HOBART |
| HYA | HYAK |
| ING | INGLEWOOD |
| KEN | KENDALL |
| KIN | KINGSTON |
| KNM | KENMORE |
| KNO | KNOBLE |
| LEA | LEA HILL |

| 3 letter code | Substation Name |
|----------------------|------------------------|
| LGY | LANGLEY |
| LLS | LAKE LOUISE |
| LLT | LAKE LEOTA |
| LMD | LAKE MERIDIAN |
| LOL | LONG LAKE |
| LON | LONGMIRE |
| LTA | LAKE TAPPS |
| LUH | LUHR BEACH |
| LWS | LAKE WILDERNESS |
| MAN | MANCHESTER |
| MCA | MCALLISTER SPRINGS |
| MIL | MILLER BAY |
| MKI | MCKINLEY |
| MOT | MOTTMAN |
| MVW | MARINE VIEW |
| NLM | NORLUM |
| NUG | NUGENTS CORNER |
| ORC | ORCHARD |
| ORT | ORTING |
| PAT | PATTERSON |
| PGA | PORT GAMBLE |
| PIK | PICKERING |
| PMA | PORT MADISON |
| POU | POULSBO |
| PRI | PRINE |
| PTR | POINT ROBERTS |
| RAI | RAINIER VIEW |
| SEM | SEMIAMMOO |
| SEQ | SEQUOIA |
| SHD | SHERWOOD |
| SHE | SHERIDAN |
| SIL | SILVERDALE |
| SIN | SINCLAIR INLET |
| SKE | SOUTH KEYPORT |
| SKY | SKYKOMISH |
| SLA | SLATER |
| SME | SOUTH MERCER |
| SNQ | SNOQUALMIE |
| SOO | SOOS CREEK |
| SUM | SUMMIT PARK |
| SWD | SERWOLD |
| SWI | SOUTHWICK |
| TOL | TOLT |
| VAS | VASHON |
| WAY | WAYNE |
| WIN | WINSLOW |

| 3 letter code | Substation Name |
|----------------------|------------------------|
| WLS | WILSON |
| WOB | WOBURN |
| WOL | WEST OLYMPIA |
| YEL | YELM |