

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

In the Matter of the Application of

PUGET SOUND ENERGY

For an Order Authorizing the Sale of All of Puget Sound Energy's Interests in Colstrip
Unit 4 and Certain of Puget Sound Energy's Interests in Colstrip Transmission System

DOCKET UE-200115

**PAUL L. CHERNICK
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT PLC-6

Puget Sound Energy Response to Public Counsel Data Request No. 59

October 2, 2020

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-200115
Puget Sound Energy
Application Authorizing Sale of PSE Interest in Colstrip Unit 4**

PUBLIC COUNSEL DATA REQUEST NO. 059:

Please refer to Direct Testimony of Ronald J. Roberts, Exh. RJR-1CT, at 7:20-8:2.

- a. Please describe in detail the factors that led PSE to consider “the potential of closing Colstrip Units 3&4” in 2018.
 - i. Please provide copies of all internal e-mails, memoranda, meeting notes, or other documentation of the factors that led PSE to consider “the potential of closing Colstrip Units 3&4” in 2018.
- b. Were the results of the 2017 IRP one of the factors that led PSE to consider “the potential of closing Colstrip Units 3&4” in 2018? Please explain.
- c. Other than the 2017 IRP, were the results of any economic analyses of the early retirement of Colstrip Units 3 and 4 one of the factors that led PSE to consider “the potential of closing Colstrip Units 3&4” in 2018? Please explain.
 - i. If so, please provide copies of all internal e-mail, memoranda, meeting notes, or other documentation of such analyses.
 - ii. If so, please provide copies of all internal e-mail, memoranda, meeting notes, or other documentation of the Company’s consideration of the results of such analyses.

Response:

Puget Sound Energy (“PSE”) objects to the temporal scope of Public Counsel Data Request No. 059 to the extent it seeks information or documents prior to calendar year 2019, the year in which PSE began negotiations for the sale of all of its interests in Colstrip Unit 4 and certain of its interests to the Colstrip Transmission System. Such information and documents are neither relevant to the subject matter involved in this action nor reasonably calculated to lead to the discovery of admissible evidence. The potential closing of Colstrip Units 3 & 4 are not, and have never been, a subject of this proceeding.