Exhibit DTA-4
Docket U-180680

Exhibit DTA-4

PSE Response to IBEW Data Request No. 001, Attachment A (PSE Overtime Hours by Cost Center 2009 to 2018)

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. 001

IBEW LOCAL 77 DATA REQUEST NO. 001

Please provide the total number of overtime hours for IBEW represented employees by department and job classification from 2010 to present.

Response:

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 001 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, in Prehearing Order 03, paragraph 22, the WUTC identified topics that were outside of the Commission's review, such as what is requested in IBEW Local 77 Data Request No. 001:

> 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 also objects to IBEW Local 77 Data Request No. 001 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 number of overtime hours for IBEW-represented employees of Puget Sound Energy ("PSE") by department and job classification from 2010 to present is not reasonably probative for consideration of the proposed transactions.

Each of the Joint Applicants further objects to IBEW Local 77 Data Request No. 001 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.

PSE pays overtime to its employees represented by the IBEW per PSE's collective bargaining agreement with the IBEW, which has definitions of overtime more generous than the Fair Labor Standards Act definition of overtime as time worked beyond 40 hours in a workweek. Consistent with PSE's collective bargaining agreement with the IBEW, employees can (and often do) receive overtime pay in weeks when they have not worked 40 hours paid at regular rates prior to receiving overtime.

Attached as Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 001 is an MS Excel spreadsheet that contains overtime hours by PSE department for the past ten years (2009 to YTD 2018), including group, cost center and the total of all overtime wage type hours, but does not include IBEW job classification.

ATTACHMENT A to the
Joint Applicants' Response to
IBEW Local 77 Data Request No. 001

Puget Sound Energy
Overtime Hours by Cost Center
2009 - YTD 2018

Group	Cost Center	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
IBEW A	1210	867.2	838.5	879.0							
IBEW A	1212			0.0							
IBEW A	1215	8,945.0	6,821.0	9,808.4	9,447.8	6,715.3	6,887.2	4,734.4	7,349.6	125.0	0.0
IBEW A	1243									3,746.8	3,830.6
IBEW A	1253									2,742.3	3,228.5
IBEW A	1254									2,018.0	2,683.5
IBEW A	1265	2,449.3	1,839.8	2,190.0	605.0	825.8	1,339.5	684.5	875.8	705.5	250.6
IBEW A	1266										495.5
IBEW A	1410									0.0	0.0
IBEW A	1413		0.0	0.0				0.0			
IBEW A	1416					0.0	0.0		0.0		
IBEW A	3010						0.0			0.0	
IBEW A	3012	-6.0									
IBEW A	3060	17,286.6	18,670.2	17,003.2	21,683.9	19,747.0	25,430.4	20,523.1	19,146.3	784.8	
IBEW A	3065						0.0			25,966.5	24,672.5
IBEW A	3090	61,881.1	59,749.5	52,946.4	68,202.9	54,568.5	65,124.3	73,100.8	75,756.3	86,677.0	72,877.3
IBEW A	3095									1,989.3	1,579.3
IBEW A	3100				0.0						
IBEW A	3115	1,488.7	1,329.9	926.9	2,655.5	2,638.9	1,701.3	2,457.5	1,994.2	3,573.6	2,307.3
IBEW A	3130	0.6	1.2	7.2							
IBEW A	3309	4,245.5	4,198.8	2,310.9	2,943.0						
IBEW A	3332							0.0	0.0		
IBEW A	4010				0.0						
IBEW A	4050									53,362.9	52,961.8
IBEW A	4056	2,979.5	1,880.0	3,441.0	2,807.8	800.8	1,153.0	981.5	1,101.3	22.5	
IBEW A	4057				2,332.7	2,881.5	3,663.5	5,240.4	7,448.3	145.5	
IBEW A	4058	7,712.0	8,101.0	7,693.0	8,554.3	7,908.8	6,936.0	7,067.8	7,609.0	173.0	
IBEW A	4059									8,149.0	11,994.8
IBEW A	4060	7,523.0	7,574.5	7,400.3	6,173.3	4,974.8	7,599.5	10,424.0	9,590.5	156.5	
IBEW A	4070	6,001.0	6,205.3	8,134.3	7,913.3	5,053.3	8,644.3	9,722.5	7,966.5	305.5	
IBEW A	4080	7,256.5	4,500.0	6,194.5	5,713.3	2,818.5	6,697.0	5,854.3	9,545.5	93.8	
IBEW A	4090	10,790.3	10,487.0	12,000.5	11,286.8	7,890.0	10,001.5	8,758.3	10,691.0	183.5	
IBEW A	4230							0.0	0.0		
IBEW A	4300	65.0	86.5	16.5	343.5	5.5	64.5	103.8	137.0	484.3	250.5
IBEW A	4502			39.8							
IBEW A	4510	1,459.0	436.0	132.3	150.5						
IBEW A	4560	1,570.8	955.3	654.5	1,829.5	814.8	1,589.8	1,944.8	1,060.5	3,577.8	1,427.5
IBEW A	4570						0.0				
IBEW A	5009									5,408.8	6,361.5
IBEW A	5017	5,557.8	4,659.3	4,174.8	5,961.5	4,928.3	5,558.3	7,569.3	6,427.8	7,936.8	6,136.3
IBEW A	5019	6,659.0	6,142.8	6,509.8	7,580.8	6,532.5	6,765.3	5,871.8	5,953.3	8,612.0	7,618.8
IBEW A	5021	5,454.3	4,705.1	5,386.3	4,450.7	4,594.3	5,808.9	5,823.3	7,025.6	5,966.8	6,324.0
IBEW A	5025	3,221.5	4,311.5	4,785.3	4,825.5	6,408.9	6,178.8	6,029.1	5,816.3	7,628.8	5,967.5
IBEW A	5140	1,509.3	1,425.5	1,639.5	1,646.8	2,551.0	2,870.5	2,004.3	2,804.5	123.8	
IBEW A	5150	6,851.3	8,160.0	6,986.3	8,171.8	8,381.8	3,068.0	4,451.5	2,886.0	5,694.0	4,728.0
IBEW A	5160	493.5	289.0	372.3	286.0	307.0	6,160.3	5,082.8	1,791.5	91.3	
IBEW A	5170	735.8	270.0	672.5	1,163.0	668.0	906.8	944.0	1,772.5	38.8	
IBEW A	5210	9,747.3	7,060.0	7,540.5	1,457.5	1,305.5	421.8				
IBEW A	5220	1,998.8	1,828.8	2,294.0	935.5	1,194.3	1,986.0	2,873.8	1,924.5	30.5	
IBEW A	5230	1,119.0									
IBEW A	5231	10.0	1,446.0	1,686.5	857.5	0.0					
IBEW A	5240	4,510.5	1,774.8	2,046.5	1,060.0	3,185.4	2,268.9	1,900.3	1,949.2	1,455.8	1,245.3
IBEW A	TOTAL	190,382.7	175,747.0	175,872.5	191,039.3	157,699.9	188,825.0	194,147.3	198,622.6	237,969.9	216,940.8
IBEW B	1110									0.0	7.3
IBEW B	1410									0.0	0.0
IBEW B	1412										0.0
IBEW B	1413	0.0	0.0	0.0							
IBEW B	1416					0.0	0.0		0.0		
IBEW B	3010	8,379.8	4,182.6	8,477.9	16,069.3	16,350.3	21,270.4	18,252.3	9,887.4	9,885.0	3,929.9
IBEW B	3011	289.8	61.3	3.8	269.5	177.1	39.7	0.0		80.3	0.4
IBEW B	3012	226.7	39.8	138.8	149.5	162.8	22.0	2.0	0.0	0.0	
IBEW B	3014									634.4	1,950.3

Group	Cost Center	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
IBEW B	3015	622.0	167.3	34.5	35.0	186.1	38.3	59.5	16.8	48.5	1.5
IBEW B	3026			0.0							
IBEW B	3036						0.0				
IBEW B	3037									0.0	0.0
IBEW B	3088									0.0	
IBEW B	3090	305.5	314.3	169.3	816.5	315.5	346.3	322.8	309.0	447.8	267.8
IBEW B	3095	75.5	117.0	195.8	133.3	334.4	508.8	675.5	353.3	385.9	209.8
IBEW B	3097				0.0						
IBEW B	3098				2.0	0.0	0.0	0.0	0.0	0.0	
IBEW B	3115	1,629.3	348.6	296.4	360.4	752.0	362.9	339.7	153.4	222.0	298.5
IBEW B	3130	231.3	107.4	47.4							
IBEW B	3180	3,908.3	627.5	417.5	1,336.6	5,854.8	4,026.3	24.0	-2.5		
IBEW B	3416									0.0	
IBEW B	3502			0.0							
IBEW B	3530	452.5	280.8	223.8	3,193.5	5,326.6	3,380.6	1,871.3	1,662.0	764.4	302.2
IBEW B	3590										0.0
IBEW B	3610					410.5	708.7	365.7	792.8	233.0	5.0
IBEW B	4035	29.5									
IBEW B	4050	92.3	37.8	91.5	50.8	45.8	40.3	32.5	110.0	298.8	394.3
IBEW B	4057						117.3	24.0	197.8	0.0	
IBEW B	4059									89.0	300.8
IBEW B	4100									0.0	2.5
IBEW B	4120	197.8	3.8	0.8	3.5	2.0	7.5	1.5	2.5	1.0	
IBEW B	4130	57.5	6.5	46.5	2.0	0.0	1.0	63.5	0.0	0.0	
IBEW B	4230	1,122.4	132.8	2,997.3	3,067.3	2,428.2	3,270.6	3,235.8	2,580.8	2,066.9	1,375.1
IBEW B	4465	212.5	2.0	0.0	0.0	54.5	10.1	81.3	151.6	0.0	
IBEW B	4510	67.8	3.0	0.0	10.5						
IBEW B	4560	48.0	40.8	25.3	160.5	112.3	296.0	221.8	88.3	437.5	142.5
IBEW B	5009									11.3	5.0
IBEW B	5017	73.8	22.5	27.1	8.3	9.3	4.0	17.0	16.0	21.8	17.3
IBEW B	5019			3.0	4.0	8.3	2.5	5.8	8.5	3.3	
IBEW B	5021	46.8	36.8	81.0	89.0	83.8	91.5	48.0	44.0	5.0	13.1
IBEW B	5025		62.5	77.5	86.8	158.3	128.0	139.8	145.5	194.8	130.8
IBEW B	5140	66.5	4.8	4.0							
IBEW B	5150	20.0	43.0	167.0	183.5	133.5	119.5	102.8	9.0	646.3	216.5
IBEW B	5160					2.0	245.0	252.0	28.0	4.0	
IBEW B	5210	3.0	0.5	6.5	12.0	4.0					
IBEW B	5240	30.5	0.0	0.0	0.0	17.5	18.9	20.3	27.6	27.5	21.5
IBEW B	5362										0.0
IBEW B	TOTAL	18,188.5	6,642.9	13,532.5	26,454.0	33,227.5	34,712.8	26,585.9	16,021.8	16,280.1	9,586.8
	Grand Total	208,571.3	182,389.9	189,405.0	217,493.4	190,927.4	223,537.8	220,733.2	214,644.5	254,250.0	226,527.7