

## **Exhibit DTA-25**

### *PSE Response to IBEW Data Request No. 18, Attachment A (Retired Utility Poles Since 2010)*

**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. 018:**

Please identify how many utility poles have been replaced per year, organized by headquarter, since 2010.

**Response:**

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 018 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 number of utility poles replaced by Puget Sound Energy ("PSE") per year, organized by headquarter, 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. 018 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. 018 is an MS Excel spreadsheet that identifies the number of PSE utility poles retired each year since 2010. Retired poles have either been (i) replaced with another pole, (ii) removed from the system (e.g., an underground conversion project), or (iii) transferred ownership (e.g., PSE no longer owns or is responsible for the pole). Except for calendar year 2013, the majority of pole retirements are generally replacements or removals. In calendar year 2013, PSE sold its service territory in Jefferson County to Public Utility District No. 1 of Jefferson County, Washington, which explains the high number of pole retirements for that calendar year resulting from transferred ownership.

**ATTACHMENT A to  
the Joint Applicants' Response to  
IBEW Local 77 Data Request No. 018**

## Distribution

Row Labels	2010	2011	2012	2013	2014	2015	2016	2017	2018	Grand Total
Distribution System, Island County,	112	151	130	94	148	103	95	78	114	1025
Distribution System, Jefferson County,	113	53	67	10187			1			10421
Distribution System, King County outside RTA District,	1657	1197	1209	1026	1061	1269	1093	1034	1028	10575
Distribution System, Kitsap County,	577	321	382	327	466	381	389	581	594	4018
Distribution System, Kittitas County,	188	117	152	148	93	213	232	37	35	1215
Distribution System, Lewis County,								1		1
Distribution System, Pierce County outside RTA District,	506	456	451	392	380	318	445	307	230	3483
Distribution System, Skagit County,	320	294	295	337	398	219	321	236	416	2837
Distribution System, Snohomish County outside RTA ,					11		2			13
Distribution System, Thurston County,	735	624	740	494	548	501	316	537	266	4761
Distribution System, Whatcom County,	527	661	514	459	493	370	467	314	301	4106
<b>Grand Total</b>	<b>4735</b>	<b>3874</b>	<b>3940</b>	<b>13464</b>	<b>3598</b>	<b>3374</b>	<b>3361</b>	<b>3125</b>	<b>2984</b>	<b>42455</b>

## Transmission

Row Labels	Sum of activity_quantity
2010	176
2011	135
2012	54
2013	163
2014	792
2015	370
2016	122
2017	592
2018	13
<b>Grand Total</b>	<b>2417</b>