

## **Exhibit DTA-11**

### *PSE Response to IBEW Data Request No. 014 (Non-High Voltage Worker)*

**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. 014**

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Please identify the Wire Guard Team (damage assessors) and their job classifications, also noting if they have any specialized training, and if they are designated a "high voltage qualified electrical worker."

**Response:**

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 014 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 Wire Guard Team and their job classifications and training are not reasonably probative for consideration of the proposed transactions. Subject to and notwithstanding these objections the Joint Applicants respond as follows.

A member of a Wire Guard Team is a separate storm role than a Damage Assessor and receives different annual training. Attached as Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 014 is an MS Excel spreadsheet that provides a list of current employees who are trained to perform Wire Guard and Damage Assessor duties, respectively, during a storm along with a summary of their respective annual training. Since departments and job titles routinely change, the data includes whether the employee is Exempt, Non-Exempt, or IBEW represented. Please note that employee names are not included in Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 014.

Members of the Wire Guard Team and Damage Assessors are not designated a "High Voltage Qualified Electrical Worker" as defined by the Washington Administrative Code (WAC) and are each trained to maintain a distance of thirty feet or greater from any downed power lines. Please note that some Journey Level Qualified Electrical Workers represented by IBEW Local 77 perform the Damage Assessor role during a storm and may be designated as a "Qualified Electrical Worker," and classifications represented by IBEW Local 77 may work as members of a Wire Guard Team. Damage Assessor training is conducted by Operational Training and includes training from Journey-level Servicemen.

**ATTACHMENT A to the  
Joint Applicants' Response to  
IBEW Local 77 Data Request No. 014**