

Exhibit DTA-6
PSE Response to IBEW Data Request No. 014

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

IBEW LOCAL 77 DATA REQUEST NO. 014

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**

| Last Name | First name | Employee Group |
|-----------|------------|----------------|
| Employee | 1 | IBEW A Group |
| Employee | 2 | Exempt |
| Employee | 3 | Exempt |
| Employee | 4 | Exempt |
| Employee | 5 | IBEW A Group |
| Employee | 6 | Exempt |
| Employee | 7 | Exempt |
| Employee | 8 | IBEW A Group |
| Employee | 9 | IBEW A Group |
| Employee | 10 | IBEW A Group |
| Employee | 11 | Exempt |
| Employee | 12 | IBEW A Group |
| Employee | 13 | IBEW A Group |
| Employee | 14 | Exempt |
| Employee | 15 | UA Local 26 |
| Employee | 16 | Exempt |
| Employee | 17 | IBEW A Group |
| Employee | 18 | IBEW A Group |
| Employee | 19 | Exempt |
| Employee | 20 | IBEW A Group |
| Employee | 21 | Exempt |
| Employee | 22 | Exempt |
| Employee | 23 | IBEW A Group |
| Employee | 24 | IBEW A Group |
| Employee | 25 | IBEW A Group |
| Employee | 26 | Exempt |
| Employee | 27 | IBEW A Group |
| Employee | 28 | Exempt |
| Employee | 29 | Exempt |
| Employee | 30 | IBEW A Group |
| Employee | 31 | Exempt |
| Employee | 32 | Exempt |
| Employee | 33 | Exempt |
| Employee | 34 | Exempt |
| Employee | 35 | IBEW A Group |
| Employee | 36 | IBEW A Group |
| Employee | 37 | IBEW A Group |
| Employee | 38 | Exempt |
| Employee | 39 | Exempt |
| Employee | 40 | IBEW A Group |
| Employee | 41 | Exempt |
| Employee | 42 | IBEW A Group |
| Employee | 43 | Exempt |
| Employee | 44 | IBEW A Group |
| Employee | 45 | Exempt |
| Employee | 46 | Exempt |

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| Employee | 47 | IBEW A Group |
| Employee | 48 | Exempt |
| Employee | 49 | IBEW A Group |
| Employee | 50 | Exempt |
| Employee | 51 | Exempt |
| Employee | 52 | Exempt |
| Employee | 53 | Exempt |
| Employee | 54 | IBEW A Group |
| Employee | 55 | Exempt |
| Employee | 56 | Exempt |
| Employee | 57 | Exempt |
| Employee | 58 | Exempt |
| Employee | 59 | IBEW A Group |
| Employee | 60 | IBEW A Group |
| Employee | 61 | Exempt |
| Employee | 62 | Exempt |
| Employee | 63 | Exempt |
| Employee | 64 | IBEW A Group |
| Employee | 65 | Exempt |
| Employee | 66 | Exempt |
| Employee | 67 | Exempt |
| Employee | 68 | Exempt |
| Employee | 69 | Exempt |
| Employee | 70 | Exempt |
| Employee | 71 | Exempt |
| Employee | 72 | Exempt |
| Employee | 73 | Exempt |
| Employee | 74 | Exempt |
| Employee | 75 | Exempt |
| Employee | 76 | Exempt |
| Employee | 77 | IBEW A Group |
| Employee | 78 | IBEW A Group |
| Employee | 79 | IBEW A Group |
| Employee | 80 | IBEW A Group |
| Employee | 81 | Exempt |
| Employee | 82 | Exempt |
| Employee | 83 | IBEW A Group |
| Employee | 84 | Exempt |
| Employee | 85 | Exempt |
| Employee | 86 | Exempt |
| Employee | 87 | IBEW A Group |
| Employee | 88 | IBEW A Group |
| Employee | 89 | Exempt |
| Employee | 90 | Exempt |
| Employee | 91 | Exempt |
| Employee | 92 | IBEW A Group |
| Employee | 93 | Exempt |

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|----------|-----|--------------|
| Employee | 94 | Exempt |
| Employee | 95 | Exempt |
| Employee | 96 | IBEW A Group |
| Employee | 97 | Exempt |
| Employee | 98 | Exempt |
| Employee | 99 | IBEW A Group |
| Employee | 100 | IBEW A Group |
| Employee | 101 | Exempt |
| Employee | 102 | IBEW A Group |
| Employee | 103 | Exempt |
| Employee | 104 | Exempt |
| Employee | 105 | Exempt |
| Employee | 106 | Exempt |
| Employee | 107 | Exempt |
| Employee | 108 | Exempt |
| Employee | 109 | IBEW A Group |
| Employee | 110 | Exempt |
| Employee | 111 | Exempt |
| Employee | 112 | IBEW A Group |
| Employee | 113 | Exempt |
| Employee | 114 | Exempt |
| Employee | 115 | Exempt |
| Employee | 116 | IBEW A Group |
| Employee | 117 | IBEW A Group |
| Employee | 118 | Exempt |
| Employee | 119 | Exempt |
| Employee | 120 | Exempt |
| Employee | 121 | Exempt |
| Employee | 122 | IBEW A Group |
| Employee | 123 | Exempt |
| Employee | 124 | Exempt |
| Employee | 125 | Exempt |
| Employee | 126 | IBEW A Group |
| Employee | 127 | Exempt |
| Employee | 128 | Exempt |
| Employee | 129 | IBEW A Group |
| Employee | 130 | Exempt |
| Employee | 131 | IBEW A Group |
| Employee | 132 | IBEW A Group |
| Employee | 133 | Exempt |
| Employee | 134 | Exempt |
| Employee | 135 | IBEW A Group |
| Employee | 136 | Exempt |
| Employee | 137 | Exempt |
| Employee | 138 | Exempt |
| Employee | 139 | Exempt |
| Employee | 140 | Exempt |

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| Employee | 141 | IBEW A Group |
| Employee | 142 | IBEW A Group |
| Employee | 143 | Exempt |
| Employee | 144 | Exempt |
| Employee | 145 | Exempt |
| Employee | 146 | Exempt |
| Employee | 147 | IBEW A Group |
| Employee | 148 | Exempt |
| Employee | 149 | Exempt |
| Employee | 150 | IBEW A Group |
| Employee | 151 | Exempt |
| Employee | 152 | IBEW A Group |
| Employee | 153 | IBEW A Group |
| Employee | 154 | IBEW A Group |
| Employee | 155 | Exempt |
| Employee | 156 | Exempt |
| Employee | 157 | Exempt |
| Employee | 158 | Exempt |
| Employee | 159 | IBEW A Group |
| Employee | 160 | Exempt |
| Employee | 161 | IBEW A Group |
| Employee | 162 | Exempt |
| Employee | 163 | IBEW A Group |
| Employee | 164 | Exempt |
| Employee | 165 | Exempt |
| Employee | 166 | IBEW A Group |
| Employee | 167 | Exempt |
| Employee | 168 | IBEW A Group |
| Employee | 169 | Exempt |
| Employee | 170 | IBEW A Group |
| Employee | 171 | Exempt |
| Employee | 172 | Exempt |
| Employee | 173 | IBEW A Group |
| Employee | 174 | Exempt |
| Employee | 175 | IBEW A Group |
| Employee | 176 | Exempt |
| Employee | 177 | IBEW A Group |
| Employee | 178 | Exempt |
| Employee | 179 | IBEW A Group |
| Employee | 180 | Exempt |
| Employee | 181 | Exempt |
| Employee | 182 | IBEW A Group |
| Employee | 183 | IBEW A Group |
| Employee | 184 | Exempt |
| Employee | 185 | Exempt |
| Employee | 186 | Exempt |
| Employee | 187 | IBEW A Group |

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|----------|-----|--------------|
| Employee | 188 | Exempt |
| Employee | 189 | Exempt |
| Employee | 190 | IBEW A Group |
| Employee | 191 | Exempt |
| Employee | 192 | Exempt |
| Employee | 193 | IBEW A Group |
| Employee | 194 | Exempt |
| Employee | 195 | Exempt |
| Employee | 196 | Exempt |
| Employee | 197 | Exempt |
| Employee | 198 | IBEW A Group |
| Employee | 199 | Exempt |
| Employee | 200 | Exempt |
| Employee | 201 | IBEW A Group |
| Employee | 202 | IBEW A Group |
| Employee | 203 | Exempt |
| Employee | 204 | IBEW A Group |
| Employee | 205 | Exempt |
| Employee | 206 | Non-Exempt |
| Employee | 207 | IBEW A Group |
| Employee | 208 | Exempt |
| Employee | 209 | IBEW A Group |
| Employee | 210 | Exempt |

| Last Name | First name | Employee Group |
|-----------|------------|----------------|
| Employee | 1 | IBEW A Group |
| Employee | 2 | IBEW A Group |
| Employee | 3 | Exempt |
| Employee | 4 | IBEW A Group |
| Employee | 5 | IBEW A Group |
| Employee | 6 | IBEW A Group |
| Employee | 7 | IBEW A Group |
| Employee | 8 | IBEW A Group |
| Employee | 9 | IBEW A Group |
| Employee | 10 | IBEW A Group |
| Employee | 11 | Exempt |
| Employee | 12 | IBEW A Group |
| Employee | 13 | IBEW A Group |
| Employee | 14 | Exempt |
| Employee | 15 | IBEW A Group |
| Employee | 16 | IBEW A Group |
| Employee | 17 | IBEW A Group |
| Employee | 18 | IBEW A Group |
| Employee | 19 | IBEW A Group |
| Employee | 20 | Exempt |
| Employee | 21 | IBEW A Group |
| Employee | 22 | IBEW A Group |
| Employee | 23 | IBEW A Group |
| Employee | 24 | IBEW A Group |
| Employee | 25 | Exempt |
| Employee | 26 | IBEW A Group |
| Employee | 27 | IBEW A Group |
| Employee | 28 | Exempt |
| Employee | 29 | IBEW A Group |
| Employee | 30 | IBEW A Group |
| Employee | 31 | IBEW A Group |
| Employee | 32 | IBEW A Group |
| Employee | 33 | IBEW A Group |
| Employee | 34 | Non-Exempt |
| Employee | 35 | IBEW A Group |
| Employee | 36 | IBEW A Group |
| Employee | 37 | IBEW A Group |
| Employee | 38 | IBEW A Group |
| Employee | 39 | IBEW A Group |
| Employee | 40 | IBEW A Group |
| Employee | 41 | IBEW A Group |
| Employee | 42 | IBEW A Group |
| Employee | 43 | IBEW A Group |
| Employee | 44 | IBEW A Group |
| Employee | 45 | IBEW A Group |
| Employee | 46 | IBEW A Group |

| Last Name | First name | Employee Group |
|-----------|------------|----------------|
| Employee | 47 | IBEW A Group |
| Employee | 48 | IBEW A Group |
| Employee | 49 | IBEW A Group |
| Employee | 50 | IBEW A Group |
| Employee | 51 | IBEW A Group |
| Employee | 52 | IBEW A Group |
| Employee | 53 | IBEW A Group |
| Employee | 54 | IBEW A Group |
| Employee | 55 | IBEW A Group |
| Employee | 56 | IBEW A Group |
| Employee | 57 | IBEW A Group |
| Employee | 58 | IBEW A Group |
| Employee | 59 | Exempt |
| Employee | 60 | IBEW A Group |
| Employee | 61 | Exempt |
| Employee | 62 | IBEW A Group |
| Employee | 63 | IBEW A Group |
| Employee | 64 | IBEW A Group |
| Employee | 65 | IBEW A Group |
| Employee | 66 | IBEW A Group |
| Employee | 67 | IBEW A Group |
| Employee | 68 | IBEW A Group |
| Employee | 69 | IBEW A Group |
| Employee | 70 | IBEW A Group |
| Employee | 71 | IBEW A Group |

Damage Assessors receive annual training and/or are assessed on overhead line, pole, and devices.

Damage Assessors receive annual training on field safety.

Damage Assessors understand the required PPE expectations, and employees can order that PPE from the MatCat.

Annually, Damage Assessors electronically acknowledge the Field Safety Code.

Operational Training provides a list of employees who have completed training/certification to Mary Hobday, who maintains the Master Call Out List.

Damage Assessor Field Safety Code

1. Stay in vehicle whenever possible
 - a. Use common sense
 - b. If the car will not make it up a hill
 - c. Debris in the roadway
2. Drive only on paved/graveled roadways/driveways
3. Do not exit vehicle without wearing the following Personal Protective Equipment:
 - a. Hard hat with adhesive reflectors
 - b. Safety glasses
 - c. Sturdy footwear/boots
 - i. During icy conditions, use traction footwear (Yaktrax) available from PSE Stores
 - d. PSE reflective vest during daylight hours, or full body reflective gear (PSE vest or jacket, and pants) outside daylight hours
4. Once you have located the damage:
 - a. Write name, phone number, date, and time on pink damage tag
 - b. Secure tag at a safe location near the pole
 - c. Not on damaged equipment
 - d. Not on a pole with damaged equipment
 - e. Not anywhere within 30 feet of fallen or downed electrical equipment or wire
 - f. Place tag on an adjacent pole or the nearest switch pole with a reference to the actual damage location
5. Maintain at least a 30 foot distance from conductors and any other electrical equipment
 - a. Never touch any wire, even if you are certain it is comms/fiber optic wire
6. Walk only on paved/graveled roadways/driveways or sidewalks
 - a. Do not walk into wooded areas
 - b. Unless you are following an obvious, cleared pathway or trail
 - c. If you have to clear or navigate brush, do not continue
 - d. Do not touch metal fences or structures with any part of your body
 - e. Do not climb over, under, or through fallen material