

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUEST

DATE PREPARED: January 11, 2010
DOCKET: UT-090842
REQUESTER: Public Counsel

WITNESS: William H. Weinman
RESPONDER: William H. Weinman
TELEPHONE: (360) 664-1109

REQUEST NO. 17: Re: Proposed Settlement Condition No. 3.

- a. Please indicate where in rebuttal or response to data requests the Joint Applicants provide additional information regarding the accuracy Frontier's estimate of synergy savings, an issue of concern for Staff as described on page 13 of William Weinman's Direct Testimony, Exhibit No. ____ (WHW-1T).
- b. Has Staff determined within what time frame synergy savings will be realized? If yes, please identify the time frame, and provide all documents supporting Staff's conclusions.

RESPONSE:

- a. Staff's recommendation for approval of the transaction under the conditions in the settlement does not depend on Frontier realizing the synergies that it projects. Staff is convinced that Frontier will be financially fit regardless of whether it realizes the synergies that it projects for its organization. Mr. Whitehouse discusses synergies at p. 54 of his rebuttal.
- b. Staff has not made any independent analysis of when or whether Frontier will achieve the synergy savings it projects.