

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSES TO DATA REQUEST

DATE PREPARED: January 7, 2010
DOCKET: UT-090842
REQUESTER: Public Counsel

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

REQUEST NO. 13: Please reference the Testimony in Support of Settlement Agreement of William H. Weinman, Exhibit No. ___ (WHW-6T), p. 16, ll. 9-11.

- a. Please provide copies of all additional information that Frontier provided to Staff that convinced Staff that the transfer of control to Frontier is in the public interest.
- b. For each piece of information that Frontier provided to Staff, please identify the specific date on which it was provided to Staff.

RESPONSE:

- a. The additional information referred to by Mr. Weinman is the Company's rebuttal testimony. The responses the companies had previously provided to data requests also provided support and verification for the companies' rebuttal testimony, and such an example is noted Public Counsel's own DR 5 to Staff (regarding power point presentations to the Frontier board that contained some of the financial analysis that was eventually presented in a much more lucid and coherent fashion in testimony). The terms that the Joint Applicants agreed in the settlement agreement also convinced Staff that the transfer of control is in the public interest.
- b. **Objection: Irrelevant, duplicative of prior requests and unduly burdensome.** Public Counsel has access to the testimony, to all of the data request responses, to the materials presented at workshops, and to the settlement agreement, and was present during substantially all of the settlement discussions.