

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of Puget Sound Energy, Ontario Teachers' Pension  
Plan Board, and Macquarie Washington Clean Energy Investment, L.P., for an Order  
Authorizing Proposed Sales of Indirect Interests In Puget Sound Energy

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DOCKET U-210542

Initial Comments of Public Counsel

**ATTACHMENT 6**

Joint Applicant's Response to Public Counsel Informal Data Request No. 15

**January 7, 2022**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket UE-210542  
Puget Sound Energy  
Joint Application for an Order Authorizing Proposed  
Sales of Indirect Interests in Puget Sound Energy**

**PUBLIC COUNSEL INFORMAL DATA REQUEST NO. 015:**

For each of the Joint Applicants who are investing in Puget Holdings, please provide the following information:

- a) details on all energy investments bought or sold over the 2019–2021 time period; and
- b) for each investment in subpart (a), the date of the transaction, the dollar amount, the reason for the sale or purchase, and the percentage of the company that was sold or bought.

**Response:**

Each of the Joint Applicants objects to Public Counsel Informal Data Request No. 015 as overbroad and unduly burdensome because it exceeds the narrow scope of this proceeding, is not reasonably calculated to lead to the discovery of evidence relevant to the possible harms associated with the Proposed Transactions, and is vague and ambiguous. Given Commission precedent that discovery regarding such matters should be "narrowly defined and focused on the proposed transaction," (Docket U-180680, Order 01 at 8), the requested materials are not reasonably probative for consideration of the Proposed Transactions.

Subject to and without waiving these objections, none. Each of the Macquarie Fund and Teachers' Fund were formed to acquire each Buyer's respective share of Puget Holdings and no such information exists. For energy investments of the owners of the respective Joint Applicants who are investing in Puget Holdings please see the Application to the Federal Energy Regulatory Commission and the Joint Voluntary Notice submitted to the Committee on Foreign Investments in the United States (the "CFIUS Filing") included in the electronic data room PSE U-210542.

Note: The CFIUS Filing, which is exempt from disclosure under 5 U.S.C. § 552, is being provided in the "Confidential" folder of the electronic data room and portions of the CFIUS filing have been designated as Confidential under WAC 480-07-160.