

**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

DOCKET U-210542

Initial Comments of Public Counsel

ATTACHMENT 10

Joint Applicant's Response to Public Counsel Informal Data Request No. 12

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. 012:

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

- a) the monetary amount of the five biggest losses absorbed by the Fund;
- b) the percent of the Fund's assets that are represented by the five biggest losses;
and
- c) the overall percentage of total losses as a percent of the Fund's assets.

Response:

Each of the Joint Applicants objects to Public Counsel Informal Data Request No. 012 as the term "Fund" is vague and ambiguous. See Joint Applicants' objection to Public Counsel Informal Data Request No. 003.

Subject to and without waiving this objection, 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.