

**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 13

Joint Applicant's Response to Public Counsel Informal Data Request No. 20

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. 020:

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

- a) copies of all studies and analyses used in evaluating PSE as an investment; and
- b) copies of all internal reports detailing and analyzing the investment in PSE.

Response:

Each of the Joint Applicants objects to Public Counsel Informal Data Request No. 020 as overbroad and unduly burdensome because it exceeds the narrow scope of this proceeding and is not reasonably calculated to lead to the discovery of evidence relevant to the possible harms associated with the Proposed Transactions. Further, each of the Joint Applicants objects to this request to the extent that it seeks confidential financial, proprietary, or trade secret information belonging to a Joint Applicant or a third party. Given Commission precedent that discovery in 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, please see documents located in the "Macquarie" and "Ontario Teachers" folders in the PSE U-210542 data room for this proceeding.