BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	DOCKET NO. UE-230313
Complainant,	DECLARATION OF ROBERT L. EARLE
v.	
PUGET SOUND ENERGY	

Respondent.

APPENDIX B

PUGET SOUND ENERGY'S RESPONSE TO PUBLIC COUNSELS INFORMAL DISCOVERY REQUEST NO. 15(C)

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket UE-230313 Puget Sound Energy 2022 Power Cost Adjustment Mechanism Report

PUBLIC COUNSEL INFORMAL DATA REQUEST NO. 015

"CONFIDENTIAL" Table of Contents

	"CONFIDENTIAL" Material
Data Request No. 015	Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy's
	Response to Public Counsel Informal Data Request No. 015

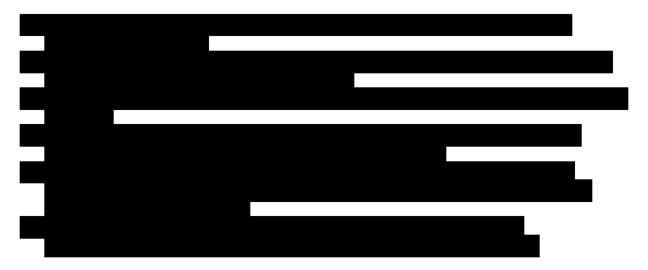
BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket UE-230313 Puget Sound Energy 2022 Power Cost Adjustment Mechanism Report

PUBLIC COUNSEL INFORMAL DATA REQUEST NO. 015:

SHADED INFORMATION IS DESIGNATED AS CONFIDENTIAL PER WAC 480-07-160

Re: PSE Response to Public Counsel Data Request No. 07, subpart g.10.



Response:

Puget Sound Energy ("PSE") objects to Public Counsel Informal Data Request No. 015 as neither relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. PSE is not seeking recovery in this proceeding of any costs associated with the Western Resource Adequacy Program ("WRAP"). Any reference to WRAP in PSE's Response to Public Counsel Data Request No. 07(g)(10) was in response to a direct question from Public Counsel regarding the general definition of a term, and WRAP is not related to this proceeding. PSE further objects to Public Counsel Informal Data Request No. 15 as seeking a response beyond that required by the Washington Utilities and Transportation Commission's discovery rules (WAC 480-07-400 through WAC 480-07-425).

Shaded information is designated as CONFIDENTIAL per WAC 480-07-160 as marked in Puget Sound Energy's Response to Public Counsel Informal Data Request No. 015.

PSE's Response to Public Counsel Informal Data Request No. 015

Date of Response: September 28, 2023

Person who Prepared the Response: Heather Pierce

Witness Knowledgeable About the Response: Phillip A. Haines