

**BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION  
COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY

Respondent.

DOCKET NO. UE-230313

DECLARATION OF  
ROBERT L. EARLE

**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**

	<b>“CONFIDENTIAL” Material</b>
<b>Data Request No. 015</b>	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**

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

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

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

[REDACTED]

**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.**