

**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 D**

**PUGET SOUND ENERGY RESPONSE TO PUBLIC COUNSEL'S INFORMAL  
DISCOVERY REQUEST NO. 14(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. 014**

**“CONFIDENTIAL” Table of Contents**

	<b>“CONFIDENTIAL” Material</b>
<b>Data Request No. 014</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. 014.

**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. 014:**

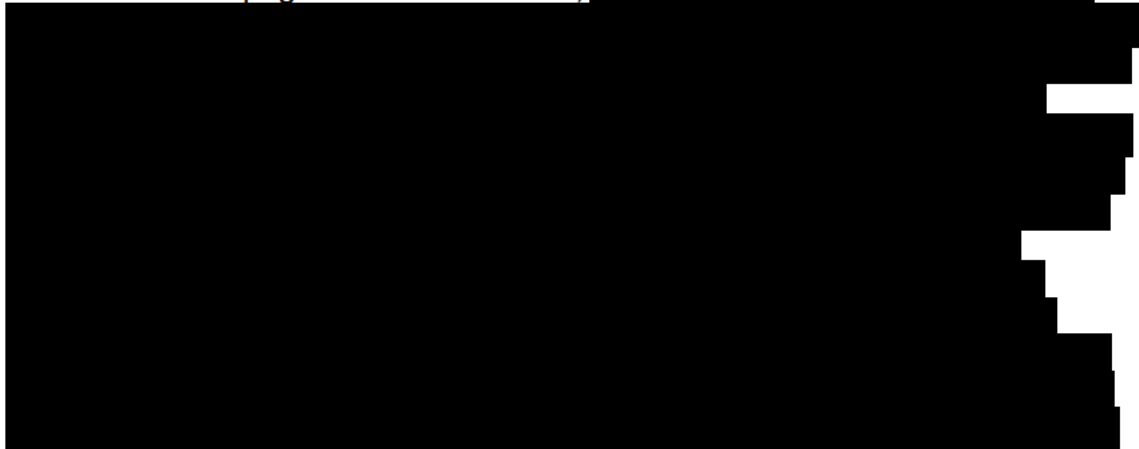
**Re: Direct Testimony of Philip A. Haines, Exh. PAH-6C, at 2.**

- a. Please provide justification with documentation and any data and calculations in Excel as to why the “proposed solution” is “resource specific.”
- b. Please explain what the consequences would be if the resources were not “resource specific” including quantification of the costs to ratepayers.

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CONFIDENTIAL PER WAC 480-07-160

**Response:**

- a. As referenced on page 2 of Exh. PAH-6C,



- b. PSE objects to Public Counsel Informal Data Request No. 014(b) as overly broad and unduly burdensome. PSE further objects to Public Counsel Informal Data Request No. 014(b) as requesting information beyond the requirements of 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. 014.

**Shaded Information is Designated as Confidential per WAC 480-07-160**