

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	DOCKET NOS. UE-121697 and
)	UG-121705
PUGET SOUND ENERGY, INC., and)	
NW ENERGY COALITION)	
)	DECLARATION OF
For an Order Authorizing PSE to Implement)	MELINDA J. DAVISON IN SUPPORT
Electric and Natural Gas Decoupling)	OF ICNU'S MOTION TO COMPEL
Mechanisms and to Record Accounting)	DISCOVERY FROM PUGET SOUND
Entries Associated with the Mechanisms)	ENERGY, INC. ("PSE")
_____)	

I, Melinda J. Davison, hereby declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

I am an attorney representing the Industrial Customers of Northwest Utilities ("ICNU") in this proceeding. I have personal knowledge of the matters set forth in this Declaration.

Attached as **Exhibit A** to this Declaration is a true and correct copy of ICNU's Second Set of Data Requests (2.1-2.2) to Respondent PSE.

Attached as **Exhibit B** to this Declaration is a true and correct copy of partial production from PSE in response to ICNU's Second Set of Data Requests (2.1-2.2) including the supplemental response.

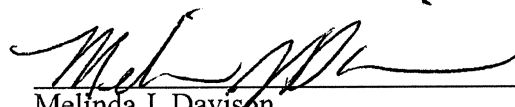
Attached as **Exhibit C** to this Declaration is a true and correct copy of correspondence between ICNU and PSE regarding the incomplete data responses, including: 1) an email exchange between Melinda J. Davison and Sheree Strom Carson, dated February 27-28, 2013; and 2) an email exchange between Melinda J. Davison and Sheree Strom Carson, dated March 7, 2013.

Pursuant to WAC § 480-07-425, ICNU certifies that the parties have conferred and were unable to resolve the dispute.

I contacted Puget Sound Energy's ("PSE") legal counsel, Sheree Strom Carson, on March 1, 2013 via telephone in order to resolve the dispute. Ms. Carson committed to an additional response by March 5, 2013. On March 5, 2013, PSE provided a partial supplemental response to DR 2.1, but nothing further in response to DR 2.2. PSE's supplemental response was essentially an attachment summarizing the Staff/PSE "global resolution" of five dockets. No further documentation was provided.

On March 7, 2013, I confirmed receipt of PSE's supplemental response to DR 2.1. Via email, I informed PSE that the supplemental response was insufficient. Also, I asked PSE to confirm its intent as to whether it would further supplement its responses to DRs 2.1 and 2.2. PSE's legal counsel informed me that that no further documents would be produced. To date, no further documents have been provided.

Executed this 11th day of March, 2013, at Portland, Oregon.



Melinda J. Davison

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DAVISON VAN CLEVE, P.C.
333 SW Taylor Avenue, Suite 400
Portland, OR 97204
Telephone (503) 241-7242