

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket No. UE-132027  
Puget Sound Energy, Inc.'s  
Petition for an Accounting Order Approving the Allocation of Proceeds of the  
Sale of Certain Assets to Public Utility District #1 of Jefferson County**

**PUBLIC COUNSEL DATA REQUEST NO. 002**

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Please provide the following regarding all efforts initially undertaken by, or on behalf of, PSE in any attempt to dissuade JPUD voters from passing Proposition No. 1 in November 2008:

- a) Internal labor and benefit dollars charged by month by FERC account
- b) Non-labor/benefits dollars charged by month by FERC account with a brief discussion/delineation of major costs incurred.
- c) A detailed description of activities undertaken by PSE employees in such efforts.
- d) Outside service charged by individual or firm by month by FERC account.
- e) A detailed description of activities undertaken by outside firms/individual in such efforts.
- f) Copies of any ads or information of any kind - using any media - issued to explain to voters why PSE did not believe passage of Proposition No. 1 would be in Jefferson County's best interest.

**Response:**

Puget Sound Energy, Inc. ("PSE") objects to Public Counsel Data Request No. 002 as neither relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving such objections, and subject thereto, PSE responds as follows:

All costs incurred by or on behalf of PSE in its attempt to dissuade Jefferson County Public Utility District ("JPUD") voters from passing Proposition No. 1 were below-the-line expenditures charged to FERC account 426.5. These costs were not included in calculating revenue requirements. These costs were not charged to customers.

Activities undertaken by PSE employees or outside firms in PSE's attempt to dissuade JPUD voters from passing Proposition No. 1 were referenced in filings made with the Washington State Public Disclosure Commission (PDC). PSE is still in the process of retrieving these publicly-available records and will provide copies of such when they become available.

As explained in the Prefiled Direct Testimony of Samuel S Osborne, Exhibit No. \_\_\_(SSO-1T), in November of 2008, at the time Proposition No. 1 was approved, JPUD was a small water and sewer utility, with approximately 4,000 customers. JPUD lacked the financing, energy, expertise and resources necessary to go into the electric business. It was not clear in 2008 if JPUD would be able to acquire these resources. PSE served Jefferson County for nearly 100 years and, based upon its experience and superior resources, PSE believed that it was far and away the superior service provider for the citizens of Jefferson County. PSE's former Jefferson County customers have not experienced a decrease in rates since taking over PSE's service area. JPUD's current rate schedule mirrors PSE's rates in effect as of the date of the transition of the service area.