

**PUGET SOUND ENERGY, INC.'S
CROSS-EXAMINATION EXHIBIT LIST**

Docket No. UE-132027

NUMBER	WITNESS	A/R	DATE	DESCRIPTION
	GORMAN, Michael			ICNU Response to PSE Data Request No.1
				ICNU Response to PSE Data Request No.2
				ICNU Response to PSE Data Request No.3
				ICNU Response to PSE Data Request No.6
				ICNU Response to PSE Data Request No.10
				ICNU Response to PSE Data Request No.11

PSE's DATA REQUEST NO. 001 to ICNU:

RE: Gorman, Exh. No. MPG-1T 3.

Please provide all analyses undertaken by or on behalf of ICNU, or relied on by ICNU, relating to determining or quantifying the amount of accumulated depreciation paid by PSE's former Jefferson County customers.

RESPONSE TO PSE's DATA REQUEST 001 to ICNU:

Mr. Gorman has not attempted to estimate the amount of depreciation expense paid directly by Jefferson County customers. Nor does he believe this to be a useful exercise, given that PSE's customers pay depreciation expense on a total-company basis. Rather, Mr. Gorman's analysis instead reflects the amount of accumulated depreciation recovered and recorded by PSE on its audited books and records. PSE's recovery of annual depreciation expense and accumulation of depreciation reserves was considered by Mr. Gorman in recommending his proposed allocation of the gross sale proceeds.

Date: April 14, 2014
Respondent: Michael P. Gorman (636-898-6725)
Witness: Michael P. Gorman

PSE's DATA REQUEST NO. 002 to ICNU:

RE: Gorman, Exh. No. MPG-1T 3.

Please provide all analyses undertaken by or on behalf of ICNU, or relied on by ICNU, relating to determining or quantifying the amount of the revenues received from PSE's former Jefferson County customers.

RESPONSE TO PSE's DATA REQUEST 002 to ICNU:

ICNU objects to the data request on the basis that it is vague and ambiguous. Notwithstanding this objection, Mr. Gorman has not performed an analysis, and does not believe it to be a useful exercise, to measure the amount of revenues PSE received from former Jefferson County customers. Please also see ICNU's response to PSE's Data Request No. 001.

Date: April 14, 2014
Respondent: Michael P. Gorman (636-898-6725)
Witness: Michael P. Gorman

PSE's DATA REQUEST NO. 003 to ICNU:

RE: Gorman, Exh. No. MPG-1T 4.

Please provide all analyses undertaken by or on behalf of ICNU, or relied on by ICNU, relating to determining or quantifying:

- a. costs (if any) incurred to provide electrical service to PSE's former Jefferson County customers that were not recovered from PSE's former Jefferson County customers.
- b. revenues received from customers (other than PSE's former Jefferson County customers) used to pay for costs incurred to provide electrical serve to PSE's former Jefferson County customers.

RESPONSE TO PSE's DATA REQUEST 003 to ICNU:

ICNU objects to this data request on the basis that it is vague and ambiguous. Notwithstanding this objection, ICNU responds as follows:

- a. Mr. Gorman has not performed the requested analysis, nor does he believe it to be a useful exercise. Please also see ICNU's response to PSE's Data Request No. 001.
- b. Mr. Gorman has not performed the requested analysis, nor does he believe it to be a useful exercise. Please also see ICNU's response to PSE's Data Request No. 001.

Date: April 14, 2014
Respondent: Michael P. Gorman (636-898-6725)
Witness: Michael P. Gorman

PSE's DATA REQUEST NO. 006 to ICNU:

RE: Gorman, Exh. No. MPG-1T 7: 9-18.

Please identify any accounting principles that support the suggested accounting treatment of the sale of a going concern business as an event of early plant retirement.

RESPONSE TO PSE's DATA REQUEST 006 to ICNU:

ICNU objects to this data request on the basis that it is vague, ambiguous and is irrelevant to Mr. Gorman's testimony. Notwithstanding this objection, Mr. Gorman's testimony does not recommend any particular accounting treatment. Rather, it analyzed the risks and rewards, and benefits and burdens to PSE and its customers as a result of the JPUD sale.

Date: April 14, 2014
Respondent: Michael P. Gorman (636-898-6725)
Witness: Michael P. Gorman

PSE's DATA REQUEST NO. 010 to ICNU:

RE: Gorman, Exh. No. MPG-1T 8: 3-11.

Please clarify if "offset" means to fully or partially offset, or to fully or partially recoup, earnings attributable to the approximately 18,000 customers that left PSE's system. If "offset" means a partial offset or less than a full recoupment of such earnings, rather than a full offset or recoupment, please state the difference and quantify the extent of the offset or recoupment.

RESPONSE TO PSE's DATA REQUEST 010 to ICNU:

It is fully offset if the sale proceeds are reinvested in utility plant and equipment and are included in rate base. Earnings relate to the level of rate base. As explained in response to PSE's Data Request 009 to ICNU, earnings relate to the size of PSE's rate base, not the number of customers on the system.

Date: April 14, 2014
Respondent: Michael P. Gorman (636-898-6725)
Witness: Michael P. Gorman

PSE's DATA REQUEST NO. 011 to ICNU:

RE: Gorman, Exh. No. MPG-1T 8: 3-11.

Please explain Mr. Gorman's assumptions with respect to the financial mechanisms by which lost earnings attributable to the approximately 18,000 customers that left PSE's system will be offset or recouped by new earnings, and please provide any analyses undertaken or relied upon with respect to such assumptions.

RESPONSE TO PSE's DATA REQUEST 011 to ICNU:

Please see response to PSE's Data Request 009 to ICNU. Earnings are not tied to number of customers, but rather are tied to rate base investments that are included in PSE's retail cost of service. If PSE reinvests the JPUD sale proceeds in its rate base, remaining customers will pay a return on PSE rate base and PSE will not experience an erosion to its earnings due to the sale of JPUD rate base assets.

Date: April 14, 2014
Respondent: Michael P. Gorman (636-898-6725)
Witness: Michael P. Gorman