

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

WUTC STAFF DATA REQUEST NO. 090

WUTC STAFF DATA REQUEST NO. 090:

What role, if any, did the witnesses who testify on behalf of PSE in these dockets have in developing and conducting the Cocker Fennessy survey? If applicable, please provide a detailed description of each witness's role developing and conducting the Cocker Fennessy survey.

Response:

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 090 to the extent it seeks information protected by the attorney client privilege or work product doctrines. Without waiving these objections, and subject thereto, PSE answers as follows:

PSE witnesses Liz Y. Norton, Malcolm B. McCulloch, and Eric E. Englert, provided information relating to the specifics of PSE's leasing service proposal, including products offered and lease terms. Once the information was conveyed to Cocker Fennessy, Cocker Fennessy prepared the survey questions. To ensure the survey contained all relevant questions, the PSE witnesses reviewed drafts of the survey questions. Cocker Fennessy then administered the survey.