

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. 095

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In reference to Exhibit No. MBM-8HC, column E, please explain if "Total Cost" includes costs for any non-standard installation charges.

Response:

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 095 as unduly burdensome as it seeks information already in the possession of, obtainable by, or otherwise available to WUTC Staff. PSE further objects to WUTC Staff Data Request No. 095 as Exhibit No. MBM-8HC does not contain a column E or use the term "Total Cost" as referenced above. Without waiving these objections, and subject thereto, PSE responds as follows:

If PSE is correct in assuming that WUTC Staff meant to reference Exhibit No. ____ (MBM-15HC) instead of Exhibit No. ____ (MBM-8HC), then, as detailed on page 20 of the Prefiled Rebuttal Testimony of Mr. Malcolm McCulloch, Exhibit No. ____ (MBM-7HCT), lines 6-7, these average costs include "costs for these installations." As these costs are associated to service provided by a variety of installation providers not contracted through PSE, it would be speculative of PSE to comment as to the nature of these installation costs. PSE referenced these total costs to demonstrate that PSE's cost inputs are comparable to current market costs.