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June 21, 2005

VIA EMAIL AND HAND DELIVERY

Carole J. Washburn
Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

**Re: Docket No. UE-050870 (Puget Sound Energy, Inc.)
Comments by Summit Power NW, LLC to Confidentiality Issue**

Dear Ms. Washburn:

I am a Managing Director of Summit Power NW, LLC (Summit). Summit is a private developer of electric power generation facilities. Our company has completed more than 30 electric power generation projects throughout the United States, and is developing several projects in the Pacific Northwest. Summit is developing one such project on behalf of the project owner, Westward Energy, LLC (Westward Energy).

Last year the sole member of Westward Energy, Northwest Energy Development, LLC (Northwest Energy), co-sponsored a proposal to Puget Sound Energy, Inc. (PSE) in response to PSE's All-Source Request for Proposals (RFP). We included detailed operational and other proprietary information as part of the proposal. Since this information was extremely commercially sensitive, we designated the information as confidential under an agreement with PSE.

We now understand that, in a proceeding pending before the Commission (Docket No. UE-050870), one or more of the parties may be seeking unrestricted access to the confidential information that we provided to PSE. For several reasons, we do not believe that such access is appropriate. We urge the Commission to either prohibit such access altogether or severely restrict a party's right to review our proprietary information.

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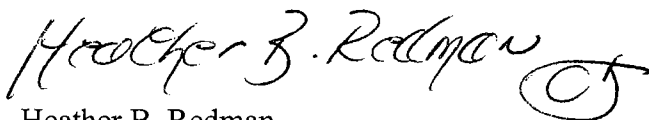
Our first concern is based on the risk of competitive harm if our proprietary information is freely available to other parties. When we respond to a utility's request (such as the RFP), we effectively compete with numerous other respondents -- *i.e.*, other project owners and developers -- for an available business opportunity. In pursuing this opportunity, however, it is inappropriate for us to have to disclose, in the public arena, our most commercially sensitive information (including pricing and contract terms). The unrestricted dissemination of such information would create a very real risk of competitive harm to our business if our competitors had equal access to the information and could use it to their advantage.

Our second concern is based on the integrity of the competitive process. In evaluating a request for proposals, if a developer must risk public disclosure of proprietary information as a condition to responding to the request, then it must decide whether the level of such risk and the cost of disclosure are appropriate to bear. Without an assurance that commercially sensitive information will remain confidential, the developer may simply decide not to respond to the request -- which will reduce the number of proposals (and hence the resource choices) that the utility can consider.

Our final concern is based on the "solution" that one or more of the parties to Docket No. UE-050870 have apparently proposed. They want their consultants to receive unfettered access to the proprietary information that we provided to PSE, despite the fact that the same consultants may work for our competitors. This is inappropriate. We do not believe that a consultant can effectively compartmentalize information it receives about one company, such that the information would be walled off from use by, or disclosure to, the consultant's clients who may compete with that company. We urge the Commission not to adopt this approach.

Thank you for the opportunity to provide these comments. Please do not hesitate to contact me if you have any questions or require further information.

Very truly yours,

A handwritten signature in black ink that reads "Heather B. Redman" followed by a stylized flourish.

Heather B. Redman
Managing Director