

**Exhibit No. \_\_\_ (SW-6)**  
**Docket U-110808**  
**Witness: Sharon Wallace**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**V.**

**PUGET SOUND ENERGY, INC.,**

**Respondent.**

**DOCKET U-110808**

**EXHIBIT TO  
REBUTTAL TESTIMONY OF**

**Sharon Wallace**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE's response to Public Counsel Data Request No. 018*

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. U-110808  
Puget Sound Energy, Inc.'s  
Complaint for violation of a Commission Order in Docket U-100182  
(Prior Obligation)**

**PUBLIC COUNSEL DATA REQUEST NO. 018**

**PUBLIC COUNSEL DATA REQUEST NO. 018:**

**Re: Gilbert Archuleta's April 3, 2012 testimony, Exhibit No. GA-1T, page 2, lines 5-9.**

Please explain why Puget Sound Energy began to change the way it managed prior obligations beginning in December 2010.

**Response:**

Puget Sound Energy, Inc. ("PSE") implemented changes to the management of its Prior Obligation process as a matter of continuous process improvement. Upon receiving WUTC Staff's notification of the original investigation (Docket No. U-100182), PSE proactively began to assess its handling of Prior Obligations and began to institute changes that improved and clarified the Prior Obligation process.