

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-090704 and UG-090705
Puget Sound Energy, Inc.'s
2009 General Rate Case**

PUBLIC COUNSEL DATA REQUEST NO. 548

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Reference Mr. Gaines rebuttal testimony, Exhibit No. DEG-11T, p. 3, ll. 13-16.

Please list the sources of the \$805.3 Million of capital invested in PSE by Puget Energy since the commencement of PSE's last general rate proceeding. If Mr. Gaines is unable to list the sources of those capital infusions from PE to PSE, please explain why.

Response:

At the time of the merger that was approved in WUTC Docket No. U-072375, members of the Investor Consortium made equity investments into Puget Holdings, LLC and loans to Puget Intermediate Holdings Inc. Those funds flowed into Puget Energy, Inc., which borrowed funds under its new credit facilities and paid certain costs, etc. The end of this process was that Puget Energy, Inc. made an \$805.3 million capital investment, as described by Donald E. Gaines on page 11 of his Prefiled Rebuttal Testimony, Exhibit No. DEG-11THC (also see Puget Sound Energy, Inc.'s Response to WUTC Data Request No. 221). Dollars are fungible, so one cannot track which dollar (e.g., investor equity, investor loan proceeds or proceeds from bank borrowings) funded any specific expenditure.