

Melinda J. Davison

From: Carson, Sheree S. (Perkins Coie) <SCarson@perkinscoie.com>
Sent: Thursday, March 07, 2013 3:37 PM
To: Melinda J. Davison
Subject: RE: Discovery Dispute in PSE's Decoupling docket

Melinda,
PSE does not intend to further supplement the response.

Sheree

From: Melinda J. Davison [<mailto:mjd@dvclaw.com>]
Sent: Thursday, March 07, 2013 12:13 PM
To: Carson, Sheree S. (Perkins Coie)
Subject: RE: Discovery Dispute in PSE's Decoupling docket

Sheree,

Thank you for your supplemental response to ICNU's DR 2.1. I still find your response to be insufficient. Please confirm that you do not intend to further supplement your responses to ICNU's DR 2.1 and 2.2.

Thanks,

Melinda

Melinda J. Davison
Attorney
Davison Van Cleve, PC
333 SW Taylor St., Suite 400
Portland, OR 97204
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mjd@dvclaw.com

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From: Carson, Sheree S. (Perkins Coie) [<mailto:SCarson@perkinscoie.com>]
Sent: Thursday, March 07, 2013 11:57 AM
To: Melinda J. Davison
Subject: RE: Discovery Dispute in PSE's Decoupling docket

Melinda,
I'm re-sending you the attached email, which was sent to you last Tuesday and contains PSE's supplemental response to ICNU DR 2.1. This response was sent to you both electronically and by hard copy on Tuesday.

Sheree Strom Carson | Perkins Coie LLP

10885 N.E. Fourth Street
Suite 700
Bellevue, WA 98004-5579
PHONE:425.635.1422

From: Melinda J. Davison [<mailto:mjd@dvclaw.com>]
Sent: Thursday, March 07, 2013 11:46 AM
To: Carson, Sheree S. (Perkins Coie)
Subject: Discovery Dispute in PSE's Decoupling docket

Dear Sheree,

As you know, on Friday we discussed ICNU's data requests 2.1 and 2.2, in which PSE failed to fully respond and failed to provide any documents in response to these requests. You committed to getting back to me by Tuesday, March 5, with an additional response. To date I have not heard from you nor have I received an updated response in regard to our data requests. As you know, the Commissioners have urged PSE to fully cooperate in responding to informal data requests in this docket.

Please advise whether you intend to provide the information requested or if ICNU should move forward with a motion to compel. Given the expedited nature of this case, I need to hear from you by the close of business today.

Thanks,

Melinda

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Melinda J. Davison

From: Carson, Sheree S. (Perkins Coie) <SCarson@perkinscoie.com>
Sent: Thursday, February 28, 2013 11:39 AM
To: Melinda J. Davison
Subject: RE: PSE's Responses to ICNU's Second Set of Data Requests in the Decoupling Docket

Yes, I am available tomorrow at 1:30.

From: Melinda J. Davison [<mailto:mjd@dvclaw.com>]
Sent: Thursday, February 28, 2013 11:36 AM
To: Carson, Sheree S. (Perkins Coie)
Cc: Karen A. Zolka
Subject: RE: PSE's Responses to ICNU's Second Set of Data Requests in the Decoupling Docket

Sheree-
Does Friday at 1:30 pm work for you? thanks Melinda

Melinda J. Davison
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From: Carson, Sheree S. (Perkins Coie) [<mailto:SCarson@perkinscoie.com>]
Sent: Wednesday, February 27, 2013 1:33 PM
To: Melinda J. Davison
Subject: RE: PSE's Responses to ICNU's Second Set of Data Requests in the Decoupling Docket

Melinda,
I am available to talk tomorrow between 10:30 and 2:30, or Friday after 11:00.

I disagree with your statements below. PSE provided names and dates regarding when meetings with Staff took place. We think it is irrelevant, and frankly harassment, to demand production of all communications between Staff and PSE. We have a fundamental disagreement as to the application of the settlement conference rules in this situation. PSE and Staff meet regularly to discuss filings and potential filings. There is nothing inappropriate about these meetings. Moreover, the substantive information you request regarding a global resolution will be available at the settlement conferences scheduled for next week. If you want to spend time litigating this, we are prepared to do so. However, I don't see how it benefits either of our clients.

Sheree

Sheree Strom Carson | Perkins Coie LLP

The PSE Building
10885 N.E. Fourth Street
Suite 700
Bellevue, WA 98004-5579
PHONE: 425.635.1422

From: Melinda J. Davison [<mailto:mjd@dvclaw.com>]
Sent: Wednesday, February 27, 2013 9:54 AM
To: Carson, Sheree S. (Perkins Coie)
Subject: PSE's Responses to ICNU's Second Set of Data Requests in the Decoupling Docket

Dear Ms. Carson-

ICNU received your responses to its second set of data requests yesterday. Essentially you objected to the two data requests and provided little if any responsive information. Please let me know when you are available to confer on this matter as required by the rules prior to our filing a motion to compel. Thank you for your prompt attention to this matter.

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