

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. 539

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Reference Mr. Markell rebuttal testimony, Exhibit No. EMM-5T, p. 11, l. 11.

Given the Company's requested return on common equity and requested debt costs, compared to the currently-allowed common equity ratio, how much would the allowance of a 48% common equity ratio increase gas and electric rates annually? Please provide supporting calculations.

Response:

Puget Sound Energy, Inc. objects to Public Counsel Data Request No. 539 as unduly burdensome. Public Counsel Data Request No. 539 purports to impose obligations on PSE in excess of those required by the Commission's discovery rules (WAC 480-07-400 through 480-07-425) because Public Counsel has a copy of the electric and gas revenue requirement models with which to make changes to the assumptions for the cost of money calculation.