

**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. 570**

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Reference page 32 of Mr. Garratt's rebuttal testimony. Please identify the specific pages of Exhibit No. RG-7HC which address each of the seven due diligence issues in the Board of Directors presentation.

**Response:**

Pages 35-40 of the Prefiled Rebuttal Testimony of Roger Garratt, Exhibit No. 52 HCT, provides the specific pages and passages in Exhibit No. RG-7HC that address six of the seven due diligence issues identified by Public Counsel. The one due diligence concern (that NAES was not allowed access to plant design, construction and operational data and operations personnel), was not discussed in the presentation to the Board of Directors because Puget Sound Energy, Inc. ("PSE") staff,

had access to design, construction and operational data for the Mint Farm Energy Center. In conjunction with the NAES due diligence report, PSE conducted a comprehensive review of all technical data. PSE was able to review all design and construction materials and plans via shared documents placed on a secured site and during numerous visits to the Mint Farm Energy Center.

Exhibit No. RG-53HCT, page 34.

Since PSE was allowed access to all information that NAES was not, PSE believes this issue to be minor, inconsequential and not worthy to note in the presentation to the Board of Directors. Please see Exhibit No. RG-53THC pages 32-35.

When discussing the NAES report and Public Counsel's due diligence concerns, it is important to note that the entire 230 page document presented in Exhibit No. RG-7HC is the "presentation to the Board of Directors"; the presentation to the Board of Directors is not a subset of this document.