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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket Nos. UG-110723 Puget Sound Energy, Inc.'s Tariff filing for Pipeline Integrity Program

PUBLIC COUNSEL DATA REQUEST NO. 037

PUBLIC COUNSEL DATA REQUEST NO. 037:

Please identify any Commission or Commission Staff order, advice, directive or other action that has prevented PSE from replacing any unsafe or defective pipeline in its system.

Response:

Puget Sound Energy, Inc. ("PSE") objects to Public Counsel Data Request No. 037 to the extent it seeks information that is neither relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. PSE further objects to Public Counsel Data Request No. 037 as requesting information obtainable from another source available to Public Counsel that is more convenient, less burdensome or less expensive. Without waiving such objections, and subject thereto, PSE responds as follows:

PSE is not aware of any such UTC order, advice, directive or other action.