

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. 038

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Is it PSE's position that the UTC does not have the legal authority to authorize recovery of costs in a general rate case for a prudent accelerated pipeline replacement plan of the type proposed in the PIP?

Response:

Puget Sound Energy, Inc. ("PSE") objects to Public Counsel Data Request No. 038 to the extent it mischaracterizes PSE's proposal in this case, calls for a legal conclusion, seeks information that is neither relevant to the issues in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence and seeks information that is 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:

The question posed in Public Counsel Data Request No. 038 is not PSE's proposal in this proceeding.