

### BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

# Docket Nos. UE-121697 and UG-121705 Puget Sound Energy, Inc. and NW Energy Coalition Joint Petition for Approval of a Decoupling Mechanism

#### **ICNU DATA REQUEST NO. 2.2**

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Please identify all PSE employees or individuals hired by PSE, Staff members, or representatives of any other parties known to PSE to have participated in discussions regarding a "global resolution" of the TransAlta Centralia power purchase agreement docket (Docket UE-121373), the above captioned decoupling docket, as well as PSE's expedited rate filing ("ERF") docket (UE-130137). Additionally, please specify the date, duration, and topics of these communications.

## First Supplemental Response:

Puget Sound Energy, Inc. ("PSE") objects to ICNU Data Request No. 2.2 as neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. PSE further objects to ICNU Data Request No. 2.2 to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, the deliberative process privilege, and ER 408 regarding the confidentiality of settlements. Without waiving those objections and subject thereto, PSE responds as follows:

After PSE filed its Request for Reconsideration, employees of PSE met with Commission Staff and entered into a "broader discussion" including "proposals that might break the current pattern of almost continuous rate cases" as requested by the Commission in Dockets UE-111048 and UG-111049, and to consider as part of this proposal, possible global resolutions of several outstanding dockets and planned filings including the Expedited Rate Filing, Dockets UE-130137 and UG-130138, PSE's decoupling petition, and PSE's Petition For Reconsideration in the Centralia power purchase agreement docket, Docket UE-121373. Below is a listing of the dates of the meetings and the participants in the meetings:

1/24/13 Staff: M. Vasconi, T. Schooley, D. Reynolds, D. Gomez, K. Elgin

(All day) PSE: K. Johnson, R. Garratt, K. Barnard; J. Piliaris (Global Settlement of Centralia, Decoupling and ERF, with GRC stayout)

1/25/13 Staff: M. Vasconi, T. Schooley, D. Reynolds, K. Elgin (2-4 p.m.) PSE: K. Johnson, R. Garratt, K. Barnard; J. Piliaris

(Global Settlement with specific focus on modified decoupling mechanism and to confirm mutual expectations regarding ERF filing)

PSE's First Supp. Response to ICNU Data Request No. 2.2 Date of Response: March 19, 2013

Person who Prepared the Response: Katherine Barnard

1/28/13 Staff: M. Vasconi, T. Schooley, D. Reynolds, S. Brown

(1:30-4:00) PSE: K. Johnson, K. Barnard; J. Piliaris, Sheree Strom Carson (Global Settlement with specific focus on modified decoupling mechanism and to

confirm mutual expectations regarding ERF filing)

2/6/13 Staff: M. Vasconi, T. Schooley, D. Reynolds, C. Mickelson

(1:30-4:00) PSE: K. Johnson, K. Barnard; J. Piliaris

(Modified Decoupling Mechanism)