



Rob McKenna

## ATTORNEY GENERAL OF WASHINGTON

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March 8, 2012

**SENT VIA E-MAIL & ABC LMI**

David Danner  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
PO Box 47250  
Olympia, WA 98504-7250

Re: WUTC v. PSE  
Docket Nos. UE-111048 and UG-111049 (Consolidated)

Dear Mr. Danner:

Enclosed for filing please find one copy of the attached electronic filing of Public Counsel's cross-examination exhibits in regard to the above-referenced dockets. The Confidential and Highly Confidential versions of these cross exhibits are in sealed envelopes. These exhibits were provided electronically on March 8, 2012 to the Records Center.

Please note, the following cross exhibits have been revised according to discussions among the parties and Bench at the hearing:

- Exhibit No. AS-28HC CX (PSE Response to Public Counsel Data Request No. 386). This exhibit has been revised to include Highly Confidential Attachment A, which is provided on disc. This inclusion was requested at the hearing by PSE and Public Counsel has no objection.
- Exhibit No. AS-74HC CX. Pages 1-2, 6, and 19 of this exhibit have been revised to update the data source for the Green World All Generic PSM III v. 13.9 model run, as requested by PSE. Also, at the time this revision was made, it came to Public Counsel's attention that there were internal page reference errors on pp. 4-8. These errors have been corrected in this revised version of the cross exhibit.

Additionally, in the process of finalizing Public Counsel's cross exhibits, Public Counsel discovered that it needed to revise two additional cross exhibits not discussed at the hearing. These include:

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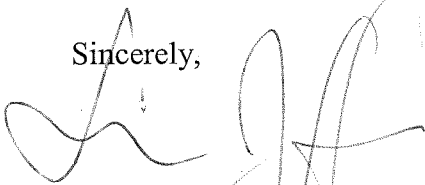
- Exhibit No. AS-76HC CX. Page 4 of this exhibit was revised to correct internal page references to workpapers included the exhibit. PSE has advised it has no objection to the corrected version of the exhibit.
- Exhibit No. JHS-39C CX (PSE Response to Public Counsel Data Request No. 507). On February 13, 2012, PSE updated its response to this data request, which updates the LSR revenue to reflect the current in-service date. This exhibit is revised to incorporate the updated response to Public Counsel Data Request No. 507.

Finally, the following cross exhibit is being offered for admission to the record:

- Exhibit No. JAP-66 CX. This exhibit is the Company's response to Public Counsel Record Requisition No. 1, discussed during cross-examination of Mr. Piliaris. PSE has advised it has no objection to the admission of this exhibit.

Please contact Carol Williams or Stefanie Johnson for questions about this filing.

Sincerely,



Simon J. Ffitch  
Senior Assistant Attorney General  
Public Counsel Section  
(206) 389-2055

SJf:cjw  
Enclosures

cc: Service List (electronic notification only)