

**Exhibit \_\_\_ (KLE-15)**  
**Docket U-072375**  
**Witness: Kenneth L. Elgin**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Joint Application of**

**DOCKET U-072375**

**PUGET HOLDINGS LLC AND PUGET  
SOUND ENERGY, INC.,**

**For an Order Authorizing Proposed  
Transaction**

**EXHIBIT TO TESTIMONY OF**

**Kenneth L. Elgin**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

***PSE Response to WUTC Staff Data Request 1053***

**June 18, 2008**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket No. U-072375**

**Puget Holdings LLC and Puget Sound Energy, Inc.  
Joint Application for an Order Authorizing Proposed Transaction**

**WUTC STAFF DATA REQUEST NO. 1053**

**WUTC STAFF DATA REQUEST NO. 1053:**

**RE: Testimony of Christopher J. Leslie**

Referring to the direct testimony of Christopher J. Leslie, Exhibit \_\_\_\_ (CJL-1T) page 27, lines 13-15, page 41, lines 20-22, and the merger commitments listed in the Joint Application and Appendix B thereto, please list each commitment that is not currently an obligation of PSE by either statute, rule or order.

**Response:**

Each of the Joint Applicants objects to WUTC Staff Data Request No. 1053 on the grounds that such data request seeks (i) a legal conclusion and (ii) information that is within the possession of WUTC Staff.

Joint Applicants' Response to WUTC Staff Data Request No. 1053  
Date of Response: February 1, 2008  
Person who Prepared the Response: N/A  
Witness Knowledgeable About the Response: N/A

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**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket No. U-072375**

**Puget Holdings LLC and Puget Sound Energy, Inc.  
Joint Application for an Order Authorizing Proposed Transaction**

**REVISED WUTC STAFF DATA REQUEST NO. 1053**

**REVISED WUTC STAFF DATA REQUEST NO. 1053:**

Regarding PSE's objections and failure to respond to Staff Data Request 1053, Staff is trying to understand which of the "Commitments" PSE makes in its direct case in support of merger approval are not current requirements of PSE as a public service company. This will assist Staff and the Commission in understanding the truly material Commitments PSE offers in this docket. Staff wishes to discern PSE's understanding, not PSE's legal conclusion. Staff does not currently possess this information. Please respond.

**Response:**

The Joint Applicants have not made an assessment of which Commitments might go above and beyond Puget Sound Energy, Inc.'s ("PSE") current obligations under law and regulation. As such, each of the Joint Applicants objects to Revised WUTC Staff Data Request No. 1053 to the extent that such data request imposes obligations upon the Joint Applicants in excess of those required by the Commission's discovery rules (WAC 480-07-400 through 480-07-425), and the Joint Applicants reassert their objections previously stated in WUTC Staff Data Request No. 1053. Without waiving such objections, and subject thereto, the Joint Applicants respond as follows:

Some background might provide useful context to understanding the intent of the "Commitments" made by the Joint Applicants in their prefiled direct evidence in this proceeding. A clear commitment to PSE's current requirements was a critical issue in negotiating the terms of the transaction. With this objective in mind, the senior executives of PSE worked with the Investor Consortium to develop a list of commitments that include some of the most basic and sensitive obligations that PSE has in its commitment to render gas and electric service to its customers in Washington state. These Commitments are intended to be a clear re-affirmation of such obligations.

These Commitments are divided into two categories, those that provide benefits to customers and those that are generally designed to ensure that the Proposed Transaction will not harm PSE's customers. The "Commitments" were not intended to be a census of PSE's many service obligations nor were they necessarily intended to

Joint Applicants' Response to Revised WUTC Staff Data Request No. 1053

Date of Response: February 29, 2008

Person who Prepared the Response: Eric Markell

Witness Knowledgeable About the Response: Eric Markell

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"go beyond" the legal requirements to render public service, although some of the Commitments obviously do "go beyond" current requirements (for example, Commitment No. 19 provides that Puget Holdings will make a contribution of \$5 million to the PSE Foundation). The Commitments were intended to be a statement that such basic obligations were of great importance to PSE, its customers and constituents and that the merger parties understood and were prepared to honor such obligations in rendering public service.