

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-111048 and UG-111049
Puget Sound Energy, Inc.'s
2011 General Rate Case**

SIERRA CLUB DATA REQUEST NO. 01.19

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Please provide any planning studies conducted by the company or contractors that explore compliance alternatives with state or federal statutes, regulations or settlements.

Response:

Puget Sound Energy, Inc. ("PSE") objects to Sierra Club Data Request No. 01.19 as overly broad and unduly burdensome in that the scope of the request is unlimited as to time and because there is no description regarding the type of compliance. PSE further objects to Sierra Club Data Request No. 01.19 because it calls for information that is outside the scope Sierra Club's intervention in this proceeding. PSE further objects to Sierra Club Data Request No. 01.19 to the extent it calls for information protected by the attorney-client privilege or the work product doctrine. PSE will not be providing such information. Without waiving these objections, and subject thereto, PSE responds as follows:

Attached as Attachment A to PSE's Response to Sierra Club Data Request No. 01.19 is a summary study of the potential impacts of proposed federal legislation on PSE thermal generating resources.

