

Exhibit No. ____ (NEH-9)

Docket No. U-072375

Witness: Nancy E. Hirsh

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Joint Application of

PUGET HOLDINGS LLC

and

PUGET SOUND ENERGY, INC.

For an Order Authorizing Proposed Transaction

Docket No. U-072375

EXHIBIT TO TESTIMONY OF

NANCY E. HIRSH

ON BEHALF OF NW ENERGY COALITION

Response to NWECA Data Request No. 1.03

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**

NWEC DATA REQUEST NO. 01.03

NWEC DATA REQUEST NO. 01.03:

[JA, p. 18, ll. 2-4 and Leslie, p. 30, ll. 20-23, p. 31, ll. 1-21] Please describe in more detail the “additional expertise and capital” that Holdings and Mr. Leslie refer to in these statements. Please identify the entities and/or individuals that hold this expertise and capital, and describe the nature of the expertise and capital. Please explain how Holdings would make this expertise and capital available to PSE.

- 1.3.1 In what way(s) would the additional expertise and capital be “needed” or “necessary” in order for PSE to achieve and meet its “environmental goals and obligations” as characterized by Mr. Leslie? Would PSE be unable to achieve and meet these goals and obligations without the expertise and capital that Holdings is willing to provide? Please explain.
- 1.3.2 During internal and external discussions leading to the acquisition agreement, did PSE express a need or desire to receive additional expertise or capital at any time from external sources (including without limitation from Holdings and the Consortium members) in order to achieve and meet PSE’s “environmental goals and obligations”? If so, please describe the nature of the need or desire and provide copies of all correspondence, written communications, notes, studies, and other documents relating to the need or desire.
- 1.3.3 Does PSE need now, or anticipate a possible future need for, “additional expertise and capital” in order for the company to meet its obligations under the Washington Energy Independence Act (Chapter 19.285 RCW) (Act) and in particular PSE’s obligation under RCW 19.85.040(1) to “pursue all available conservation that is cost-effective, reliable, and feasible”? If so, please describe the additional expertise and capital that is or could be needed. Would PSE be unable to meet its obligations under the Act without this additional expertise and capital? Please explain.

Response:

Please see Joint Applicants' Response to Public Counsel Data Request No. 3023 for a list of the individuals that hold this expertise. Please see Joint Applicants' Response to WUTC Staff Data Request No. 1054 for the additional capital referenced in the Joint Application.

- 1.3.1 Neither Puget Holdings LLC ("Puget Holdings") nor Puget Sound Energy, Inc. ("PSE") asserts that PSE needs the referenced additional expertise and capital or that such be additional expertise and capital is necessary for PSE to achieve and meet its environmental goals and obligations. Instead, this additional expertise and capital will assist PSE to meet such goals and obligations. Please also see Joint Applicants' Response to Public Counsel Data Request No. 3022 and Joint Applicants' Response to WUTC Staff Data Request No. 1054.
- 1.3.2 Please see Joint Applicants' Response to NWECC Data Request No. 1.3.1, above.
- 1.3.3 Please see Joint Applicants' Response to NWECC Data Request No. 1.3.1, above.