

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket No. UE-070725
Amended Petition of Puget Sound Energy, Inc. For an Order Authorizing
the Use of the Proceeds from the Sale of RECs and CFIs**

PUBLIC COUNSEL DATA REQUEST NO. 067

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Reference page 17 of Mr. De Boer's rebuttal testimony. Please provide any assessments performed by PSE since January of 2008 regarding the probable recovery of the \$21 million California Receivable and associated interest which considered factors such as the related litigation risk, the time required to obtain a final judgment, and legal and administrative costs of fully litigating this claim.

Response:

Periodically throughout the California Receivables litigation, Puget Sound Energy, Inc. ("PSE") received reports and assessments of the matter from its outside counsel and/or various consultants retained by counsel—all of which, to the extent that they are written, are privileged documents under attorney-client and attorney work product doctrines. These reports included frequent oral conversations and written assessments. Consistently, however, these reports confirmed the appropriateness of the amount recorded as PSE's "California Receivable." If they had varied from that conclusion, PSE would have been required to take appropriate accounting and SEC-reporting steps.