

**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. 064**

**PUBLIC COUNSEL DATA REQUEST NO. 064:**

Please provide the date and amount of any settlement offers made to PSE to settle the California Receivable litigation from the time initial claims were made by PSE until the global settlement of the litigation was reached, and indicate the reasons why PSE rejected each such offer.

**Response:**

Puget Sound Energy, Inc. ("PSE") objects to Public Counsel Data Request No. 64 as not reasonably calculated to lead to the discovery of admissible evidence. Public Counsel Data Request No. 64 calls for information regarding confidential settlement negotiations that are not admissible evidence. Without waiving such objection, and subject thereto, PSE responds as follows:

Settlement discussions were held periodically and were conducted entirely through the auspices of FERC counsel, FERC staff, FERC Administrative Law Judges, and/or Ninth Circuit mediators. Prior to the ultimate settlement reached, no offer made to PSE was satisfactory enough PSE to be willing to settle, as compared to continue litigation.