

EXHIBIT NO. \_\_\_\_\_ (JMR-18)  
DOCKET NO. UE-031725  
2003 POWER COST ONLY RATE CASE  
WITNESS: JULIA M. RYAN

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

Docket No. UE-031725

v.

PUGET SOUND ENERGY, INC.,

Respondent.

REBUTTAL TESTIMONY OF  
JULIA M. RYAN  
ON BEHALF OF PUGET SOUND ENERGY, INC.

FEBRUARY 13, 2004

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

WUTC Docket No. UE-031725  
Puget Sound Energy, Inc.  
2003 Power Cost Only Rate Case

ICNU DATA REQUEST NO. 05.01

**ICNU DATA REQUEST NO. 05.01:**

Please provide a complete set of all documents that refer or relate to any meeting of Puget's Risk Management Committee from January 1, 1998 to the present. These documents should include all meeting agendas, handout materials, notes from all attendees, and meeting minutes.

**Response:**

PSE objects to this data request as overbroad. Some of the requested materials are beyond the permissible scope of discovery: "Data requests must seek only information that is relevant to the issues in the adjudicative proceeding or that may lead to the production of information that is relevant." WAC 480-07-400(4). PSE also objects to this data request to the extent that this request is unreasonably cumulative to the data requests that have been tendered and answered on topics of relevance to this proceeding. *Id.* Finally, PSE objects to this data request because it is unduly burdensome. PSE's Risk Management Committee (RMC) meeting agendas, handout materials, and meeting minutes, dating back to March 1999 comprise six five-inch volumes of materials, containing more than 8,000 pages. Although materials considered by the RMC may exist in various historical files for the time period beginning January 1, 1998, PSE does not have a collection of RMC materials prior to March 1999. Other requested documents, such as notes from individual meeting attendees during this time period, are difficult if not impossible to locate, to the extent they exist.

Subject to these objections, PSE will make available for inspection at Heller Ehrman White & McAuliffe's Seattle office the six volumes of collected PSE's Risk Management Committee meeting agendas, handout materials, and meeting minutes, dating back to March 1999. Records for the period prior to March 1999 were not collected in similar form. Between March 1999 and March 2000, RMC meeting minutes were created only informally. In March 2000, the RMC decided to create, review and adopt formal typewritten meeting minutes. Thus, the meeting minutes created after March 2000 are more formal in nature and have been reviewed by other participants for accuracy. If, upon inspection, ICNU (or another party entitled to discovery of "confidential" and "highly confidential" materials in this docket) desires copies of specific documents, PSE

will make such copies, assign the appropriate level of confidentiality to such documents, and will produce a supplemental response to this data request for all parties participating in discovery. Please contact Ms. Lisa Hardie at (206) 389-4279 to make arrangements to inspect the documents at a mutually acceptable time.

Assigned witness: WAG/JMR

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