

EXHIBIT B

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

PSE Data Request No. 001 to WSHVACCA:

Provide all documents or analysis undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to PSE's proposed Equipment Lease Program.

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

PSE Data Request No. 002 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to its efforts to provide energy efficient water heating and HVAC equipment options to customers in Western Washington.

(Refer to Petition to Intervene by WSHVACCA, paragraphs 1 and 2)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
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PSE Data Request No. 003 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to the market for water heating and HVAC equipment and services in Washington, including the market for the sale, installation, maintenance, and repair of such equipment, market penetration of the sale, installation, maintenance, and repair of such equipment, any barriers to market entry, and the relative market share of WSHVACCA and its individual members.

(Refer to Petition to Intervene by WSHVACCA, paragraphs 1-5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

PSE Data Request No. 004 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to the market for water heating or HVAC equipment and services in Washington, including the market for financing, leasing or renting such equipment, market penetration of equipment financing, leasing or rental services, any barriers to market entry, and the relative market share of any equipment financing, leasing or rental services, including any services financed, funded, promoted or provided by WSHVACCA or its individual members. (Refer to Petition to Intervene by WSHVACCA, paragraphs 1-5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

PSE Data Request No. 005 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to its efforts to provide financing options to customers for water heating and HVAC equipment since January 1, 2013, including:

- a) the total number and percentage of WSHVACCA's individual members' customers who finance their water heating and HVAC equipment, and any demographic information about such customers;
- b) a breakdown of the types of financing options available to and ultimately selected by customers;
- c) any agreements, contracts or documents demonstrating or relating to any business relationship between WSHVACCA or any individual member, and any third-party financing source;
- d) any documents referring or relating to a financing option financed, funded, promoted or provided by WSHVACCA or any individual member, including any marketing or promotional materials; and
- e) a listing of all WSHVACCA members who offer financing options and a listing of the type of financing options financed, funded, promoted or provided by each member.
(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

PSE Data Request No. 006 to WSHVACCA:

Provide all documents relating to the terms of any financing options offered by WSHVACCA or any individual member to customers for water heating and HVAC equipment, including copies of any financing agreements or contracts, the terms and conditions of such agreements or contracts, underwriting processes, qualifying requirements, and interest rate.

(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
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PSE Data Request No. 007 to WSHVACCA:

Provide all documents in Your possession, custody or control relating to financing options available for water heating and HVAC equipment in Western Washington.
(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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**Docket Nos. UE-151871 UG-151872
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PSE Data Request No. 008 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or any individual member, or any other documents or analysis, relating to its efforts to provide leasing or rental options for water heating and HVAC equipment, since January 1, 2013.

(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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**Docket Nos. UE-151871 UG-151872
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PSE Data Request No. 009 to WSHVACCA:

Provide all documents sufficient to show which WSHVACCA members offer leasing or rental programs for water heating and HVAC equipment, the terms of those leasing or rental programs, how many of their customers lease or rent their equipment, the percentage of customers that lease or rent their equipment, and any demographic information about such customers, since January 1, 2013.

(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

PSE Data Request No. 010 to WSHVACCA:

Provide all documents in Your possession, custody or control relating to the leasing or rental of water heating and HVAC equipment in Western Washington.
(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
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PSE Data Request No. 011 to WSHVACCA:

Provide the total number of water heating and HVAC equipment sales and installations performed by WSHVACCA's individual members, and a breakdown of such sales and installations by county, since January 1, 2013, using the format below. (Refer to Petition to Intervene by WSHVACCA, paragraphs 1 and 2)

County	Water Heater Sales and Installations	HVAC Equipment Sales and Installations
[List county]		
[List county]		

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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PSE Data Request No. 012 to WSHVACCA:

Provide the total number of water heating and HVAC equipment maintained, serviced or repaired (not installed) by WSHVACCA's individual members, and a breakdown of such services or repairs by county, since January 1, 2013, using the format below. (Refer to Petition to Intervene by WSHVACCA, paragraphs 1 and 2)

County	Water Heaters Serviced	HVAC Equipment Serviced
[List county]		
[List county]		

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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PSE Data Request No. 013 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, supporting the proposition that

“PSE’s proposal would . . .”

- (a) “have a chilling effect on the competitive market in Washington,”
- (b) “harm[] consumers and ratepayers,”
- (c) “harm[] existing efforts that have actually increased the use of energy efficient appliances.”

(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE’s request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE’s request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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PSE Data Request No. 014 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, sufficient to show the average rates or prices for WSHVACCA's services, including the sale or lease, installation, maintenance, and servicing of water heating and HVAC equipment, since January 1, 2013.

(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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PSE Data Request No. 015 to WSHVACCA:

Provide a list all of current WSHVACCA members and their primary business addresses and applicable business license number, L&I license number, and contractor license number, in the form of the table below.

WSHVACCA Member	Primary Address	Business License Number	L & I License Number	Contractor License Number

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
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PSE Data Request No. 016 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to the relative age of water heating and HVAC equipment currently in use in Western Washington, including the number and percentage of such equipment that is fifteen (15) years old or more.

(Refer to Petition to Intervene by WSHVACCA, paragraph 1)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
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PSE Data Request No. 017 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to WSHVACCA's or its individual members' efforts to replace water heating and HVAC equipment in Washington that is fifteen (15) years old or more, since January 1, 2013.

(Refer to Petition to Intervene by WSHVACCA, paragraph 1)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UE-151871 UG-151872
Puget Sound Energy's
Electric and Natural Gas Equipment Lease Service**

PSE Data Request No. 018 to WSHVACCA:

For all sales of water heating and HVAC equipment in Western Washington by WSHVACCA's individual members since January 1, 2013, list the total number, percentage, and breakdown by equipment type, of equipment sales that are equipped with Demand Response technology. (Refer to Petition to Intervene by WSHVACCA, paragraph 1)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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PSE Data Request No. 019 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to WSHVACCA's or its individual members' efforts and capability to provide Demand Response services to customers, since January 1, 2013. (Refer to Petition to Intervene by WSHVACCA, paragraph 1)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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PSE Data Request No. 020 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to the regional maturity of:

- a) Demand Response services;
- b) Customer interest in Demand Response;
- c) Commercial availability of Demand Response equipment; and
- d) Demand Response technology.

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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PSE Data Request No. 021 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analysis relied on by WSHVACCA, or its individual members, or any other documents or analysis, relating to any existing comprehensive lease options in Western Washington for water heating and HVAC equipment, which lease options include equipment repairs, scheduled maintenance and replacement during the lease term.
(Refer to Petition to Intervene by WSHVACCA, paragraph 5)

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.

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PSE Data Request No. 022 to WSHVACCA:

Provide copies of all postings made on the WSHVACCA website, or any other electronic communication network (email, blog, text, website, twitter, Facebook), and any communications (electronic or otherwise), including communications between WSHVACCA and its individual members, relating in any way to PSE's Equipment Lease Program.

RESPONSE:

WSHVACCA objects to the PSE data request as designed to bully, intimidate, harass, and retaliate.

WSHVACCA also further objects as PSE's request is overly broad, seeks information to which PSE is not entitled, would be unduly burdensome, and could not be complied with prior to the evidentiary hearing.

WSHVACCA also further objects as PSE's request is outside the scope of the duties of the limited intervention granted to WSHVACCA as an intervener.

WSHVACCA further objects to the PSE data request to the extent that the PSE data request requests WSHVACCA to perform research for the benefit of PSE.