

EXHIBIT C

May 11, 2016

David S. Steele
DSteele@perkinscoie.com
D. +1.425.635.1633
F. +1.206.359.4758

VIA EMAIL

James L. King, Jr.
Government Affairs Director
Washington State Heating, Ventilation & Air Conditioning Association
120 State Avenue NE #199
Olympia, WA 98501-8212

**Re: *Washington Utilities and Transportation Commission v. Puget Sound Energy*, Dockets
UE-151871 and UG-151872 (Consolidated)
Puget Sound Energy Data Requests Nos. 001-022**

Dear Jim:

I write to memorialize our call on May 10, 2016, which Sheree Carson and I scheduled with you to discuss the Washington State Heating, Ventilation & Air Conditioning Association's ("WSHVACCA") responses to Puget Sound Energy's ("PSE") Data Requests Nos. 001-022, served on April 15, 2016. We undertook this call pursuant to WAC 480-07-425(1), which requires the parties to make a good faith effort to resolve informally all discovery disputes.

As discussed during our call, after reviewing WSHVACCA's responses to PSE's requests, we were concerned that WSHVACCA did not provide any substantive responses to PSE's requests but rather provided the same, verbatim objections to each of PSE's requests. Sheree and I expressed a desire and willingness to discuss with you each of WSHVACCA's objections to PSE's requests and possible ways the parties could negotiate a resolution to WSHVACCA's objections. However, you were unwilling to discuss in detail your objections and how they relate to PSE's individual requests, or any possible ways to resolve your objections, other than through PSE filing a motion to compel discovery.

Under the relevant discovery rules, parties are required to respond to data requests if the request seeks 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(2)(b)(3). Given that the limited role of the Intervenor in this matter is to provide information as it relates to "the market for HVAC equipment to the extent necessary to determine the effect of the tariffs on PSE's customers," we believe it is appropriate for WSHVACCA to respond to data requests and produce documents that will contribute to this inquiry. Accordingly, nearly all of PSE's requests to WSHVACCA center on requesting discovery as it relates to either (1) the market for HVAC services or (2) purchasing, financing, or leasing HVAC equipment. These subjects are directly

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relevant to the core issues in this case and we believe WSHVACCA is required to produce documents in its possession that relate to these subject areas. To be clear, as explained in PSE's requests, PSE is not asking WSHVACCA to produce privileged documents, e.g., documents that are protected by the attorney-client privilege.

As a third-party that affirmatively sought inclusion in this proceeding, WSHVACCA is required to comply with the relevant discovery rules and procedures. WSHVACCA has responded to similar data requests propounded to Staff but has refused to provide the same information to PSE. In addition, in good faith, PSE has also responded to data requests served by WSHVACCA on PSE. PSE expects WSHVACCA to reciprocate and provide good faith responses to discovery served by PSE.

In the spirit of compromise, for the time being, PSE is willing to narrow the scope of its requests to only information held by WSHVACCA and not its individual members and will grant WSHVACCA a one-week extension to respond, until May 18, 2016. However, PSE reserves the right to re-address the scope of its requests, if necessary, in the future.

If we have misrepresented any of WSHVACCA's positions taken during our call, or if you would like to discuss WSHVACCA's objections further, we are happy to discuss at any time.

Very truly yours,



David S. Steele

DSS:dss

cc: Sheree Strom Carson