EXHIBIT E

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
v.
PUGET SOUND ENERGY

DOCKETS UE-151871 and UG-151872 (*Consolidated*)

RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 1

Request No.:	1
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 1 TO PUBLIC COUNSEL:
Please provide one copy of Public Counsel's responses to all data requests submitted by all other parties in this proceeding, including any electronic versions of such responses. Please provide electronic copies of the responses to all PSE data requests to psedrs@perkinscoie.com. Please provide hardcopies and any CD-ROMs to the attention of:

Sheree Strom Carson
David Steele
Perkins Coie LLP
10885 NE 4th Street
Suite 700
Bellevue, WA 98004-5579
Email: scarson@perkinscoie.com
dsteele@perkinscoie.com
Phone: (425) 635-1422
Fax: (425) 635-2422

RESPONSE:
Public Counsel will provide copies of its responses to all data requests to Puget Sound Energy.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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DOCKETS UE-151871 and UG-151872 (*Consolidated*)

RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 2

Request No.:	2
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 2 TO PUBLIC COUNSEL:
Provide all documents or analysis undertaken by or on behalf of Public Counsel, or any documents or analyses relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, relating to PSE's proposed Equipment Lease Program.

RESPONSE:
Public Counsel objects to PSE Data Request No. 2 as burdensome and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery.

Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

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BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
v.
PUGET SOUND ENERGY

DOCKETS UE-151871 and UG-151872 (*Consolidated*)

RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 3

Request No.:	3
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 3 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analyses relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, relating to any efforts by the market to provide energy efficient water heating and HVAC equipment options to customers in Western Washington.

RESPONSE:
Public Counsel objects to PSE Data Request No. 3 as burdensome and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
v.
PUGET SOUND ENERGY

DOCKETS UE-151871 and UG-151872 (*Consolidated*)

RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 4

Request No.:	4
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 4 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analysis relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, 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.

RESPONSE:
Public Counsel objects to PSE Data Request No. 4 as burdensome and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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v.
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DOCKETS UE-151871 and UG-151872 (*Consolidated*)

RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 5

Request No.:	5
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 5 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analysis relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, 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.

RESPONSE:
Public Counsel objects to PSE Data Request No. 5 as burdensome duplicative and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine.

Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing

its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 6

Request No.:	6
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 6 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analysis relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, relating to efforts to provide financing options to customers for water heating and HVAC equipment, including but not limited to any of the following:

a) the total number and percentage of customers who finance their water heating and HVAC equipment installations in PSE's service territory, 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 any water heater or HVAC contractor and any third-party financing source;

d) any documents referring or relating to a financing option financed, funded, promoted or provided by any water heater or HVAC contractor, including any marketing or promotional materials; and

e) a listing of all water heater or HVAC contractors who offer financing options and a listing of the type of financing options financed, funded, promoted or provided by each contractor

RESPONSE:
Public Counsel objects to PSE Data Request No. 6 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 7

Request No.:	7
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 7 TO PUBLIC COUNSEL:
Provide all documents relating to the terms of sale, service and financing options offered by any water heater or HVAC contractor to customers for water heating and HVAC equipment, including copies of any sale, service or financing agreements or contracts, the terms and conditions of such agreements or contracts, underwriting processes, qualifying requirements, and interest rate.

RESPONSE:
Public Counsel objects to PSE Data Request No. 7 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 8

Request No.:	8
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 8 TO PUBLIC COUNSEL:
Provide all documents in Your possession, custody or control relating to financing options available for water heating and HVAC equipment in Western Washington.

RESPONSE:
Public Counsel objects to PSE Data Request No. 8 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 9

Request No.:	9
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 9 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analysis relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, relating to efforts by any water heater or HVAC contractor to provide leasing or rental options for water heating and HVAC equipment.

a) Are such leasing or rental options predicated in publically available fixed rates that are fixed throughout the full term of the lease or rental service term?

b) Do such leasing or rental options require down payment requirements?

c) Are all non-standard conditions, such as installations which require additional equipment or modifications as required by code; additional man-power or special equipment, such as cranes or lifts; or installations which require structural changes or non-standard prep work, such as adding or removing walls or drywall, or adding, moving or extending electrical wiring, changing the electrical panel, venting, plumbing or Natural Gas lines; included in the publically available fixed rates of such leasing or rental option?

d) Do such leasing or rental options include scheduled equipment maintenance services, and if so at what frequency?

e) Do such leasing or rental options include terms and conditions detailing repair, replacement, transfer and termination obligations?

RESPONSE:

Public Counsel objects to PSE Data Request No. 9 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 10

Request No.:	10
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 10 TO PUBLIC COUNSEL:
Provide all documents sufficient to show which water heater or HVAC contactors 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.

RESPONSE:
Public Counsel objects to PSE Data Request No. 10 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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DOCKETS UE-151871 and UG-151872 (*Consolidated*)

RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 11

Request No.:	11
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 11 TO PUBLIC COUNSEL:
Provide all documents in Your possession, custody or control relating to the leasing or rental of water heating and HVAC equipment in Western Washington.

RESPONSE:
Public Counsel objects to PSE Data Request No. 11 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

UTILITIES AND TRANSPORTATION COMMISSION

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v.
PUGET SOUND ENERGY

DOCKETS UE-151871 and UG-151872 (*Consolidated*)

RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 12

Request No.:	12
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 12 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analysis relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, 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.

RESPONSE:
Public Counsel objects to PSE Data Request No. 12 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 13

Request No.:	13
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 13 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analysis relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, relating to efforts by the market to replace water heating and HVAC equipment in Washington that is fifteen (15) years old or more, since January 1, 2013.

RESPONSE:
Public Counsel objects to PSE Data Request No. 13 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

BEFORE THE WASHINGTON STATE

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 14

Request No.:	14
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 14 TO PUBLIC COUNSEL:
Has Public Counsel conducted an analysis to determine whether or not there is a need for Equipment Lease Service? If so, what does the analysis show in terms of a need within the market?

RESPONSE:
Public Counsel objects to PSE Data Request No. 14 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 15

Request No.:	15
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 15 TO PUBLIC COUNSEL:
Do you agree with the assessment of the Northwest Energy Efficiency Council on p. 1 of its Comments in this docket, submitted 10/19/2015, that PSE's Equipment Leasing Service may "serve a market component that may take advantage of equipment leasing options that could both increase the penetration of energy efficient equipment installed in their customer's homes and provide both a quality assurance function for its installation and a more rigorous preventive maintenance program than what might be otherwise expected under baseline market conditions?" Why or why not?

RESPONSE:
Public Counsel is unable to respond to this question in the manner requested because the Data Request does not correctly quote The Northwest Energy Efficiency Council (NEEC) Comments. The Comments do not state that it is NEEC's assessment that PSE's Leasing Equipment Service may "serve a market component," etc., but rather: "Our understanding is that PSE intends to serve a market component,"[1] etc.

The NEEC Comments were filed in October 2015, prior to the time PSE presented the version of the proposal that is currently before the Commission.

[1] Comments of Northwest Energy Efficiency Council at 1 (October 19, 2015).

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 16

Request No.:	16
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 16 TO PUBLIC COUNSEL:
Do you agree with the assessment of the Northwest Energy Efficiency Council on p. 1 of its Comments in this docket, submitted 10/19/2015, that PSE's "leasing program effort should be judged in its ability to increase the penetration and long term performance of energy efficient equipment in the field and in its ability to do so in a fully collaborative partnership with the private sector?" Why or why not?

RESPONSE:
Public Counsel agrees that "penetration and long term performance of energy efficient equipment in the field"[2] are among many important factors to be considered in evaluating utility energy efficiency program, while noting that PSE takes the position that the proposed leasing service is not a conservation program. Public Counsel notes that this quotation is taken from a section of the NEEC Comments that emphasizes caution regarding the effect of a utility program on existing markets, stating for example that, "The program should be carefully designed and implemented to avoid undermining the business model of those private sector businesses who share the utility's goal of increasing energy efficiency and customer satisfaction." The NEEC Comments were filed in October 2015, prior to the time PSE presented the version of the proposal that is currently before the Commission.

[2] Comments of Northwest Energy Efficiency Council at 1 (October 19, 2015).

UTILITIES AND TRANSPORTATION COMMISSION

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 17

Request No.:	17
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 17 TO PUBLIC COUNSEL:
Provide all documents or analyses undertaken by or on behalf of Public Counsel, or any documents or analysis relied on by Public Counsel, or any other documents or analysis in Your possession, custody, and control, referring in any way to Demand Response technology as it relates to water heaters and HVAC equipment including, relating to the regional maturity of:

a) Demand Response services;

b) Customer interest in Demand Response;

c) Commercial availability of Demand Response equipment and incremental cost of such equipment over standard retail equipment;

d) Demand Response technology;

e) Demand Response programs, including pilots; and

f) Any public benefits of Demand Response.

RESPONSE:
Public Counsel objects to PSE Data Request No. 17 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

PSE should have in its possession the third-party evaluation of PSE's Bainbridge Island Demand Response effort. In addition, PSE has recently shared with its Conservation Resource Advisory Group (CRAG) a draft RFP for Demand Response.
Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 18

Request No.:	18
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 18 TO PUBLIC COUNSEL:
Public Counsel's Comments in this docket, submitted 11/9/2015, at page 2 states that "because PSE is seeking a two-step approval process, without providing specific rate information at this time, it is not possible for stakeholders to fully evaluate the potential cost-effectiveness of the program."

a) Please provide Public Counsel's definition of "cost-effective" and explain how this applies to the Equipment Lease Service.

b) What level or measure of cost-effectiveness does Public Counsel believe PSE is required to achieve with its Equipment Lease Service?

c) Please provide all documents or analyses undertaken by or on behalf of Public Counsel, or relied on by Public Counsel, relating to the cost-effectiveness of PSE's proposed Equipment Lease Service.

d) Please provide the laws, rules, or policy documents that establish that PSE's proposed Equipment Lease Service must meet the cost-effective threshold defined above.

RESPONSE:

a) Public Counsel's definition of "cost-effective" is informed by the Energy Independence Act (RCW 19.285), RCW 19.285.030 and RCW 19.285.040, RCW 80.52.030, Chapter 480-109 WAC, and PSE's Electric Schedule No. 83 and Natural Gas Schedule 183. Public Counsel's review of PSE's proposed Equipment Lease Service will include an assessment of whether the Company has demonstrated that the benefits outweigh the costs and risks of the program.

b) To the extent PSE is seeking a legal conclusion we object to the request as seeking legal opinion. Without waiving this objection, we provide this response: The evaluation of whether PSE's Equipment Lease Service is in the public interest may include analyses of cost-effectiveness and evaluations of the program benefits relative to program costs. Public Counsel is open to reviewing the proposed Equipment Lease Service through a variety of valid cost-effectiveness screens.

c) Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

d) Objection. This request asks Public Counsel to perform and provide a legal analysis on behalf of the Company.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 19

Request No.:	19
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 19 TO PUBLIC COUNSEL:
Public Counsel's Comments in this docket, submitted 11/9/2015, at page 2 states that "the company states that the program will promote greater penetration of energy efficient equipment and will reduce overall energy demand and customer energy bills. Public Counsel has not seen compelling evidence to support this claim."

a) Please provide Public Counsel's definition of "compelling evidence."

b) How does Public Counsel propose to measure the "public benefit" of PSE's proposed Equipment Lease Service?

c) Please provide the laws, rules, or policy documents that establish that PSE's proposed Equipment Lease Service must demonstrate "compelling evidence" as defined above.

d) Please provide all documents or analyses undertaken by or on behalf of Public Counsel, or relied on by Public Counsel, relating to the public benefit of PSE's Equipment Lease Service.

e) Does Public Counsel believe that the "benefit streams" detailed on page 2 of the Prefiled Direct testimony of Ahmad Faruqui, Ph.D. present "compelling evidence" in support of these proposed schedules? Why or why not?

RESPONSE:

Public Counsel objects to PSE Data Request No. 19 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

a) The terms "compelling" and "evidence" are used according to their standard dictionary definitions.

b) Public Counsel's review of PSE's proposed Equipment Lease Service will include an evaluation of whether the Company has demonstrated that the benefits to PSE customers outweigh the costs and risks of the program. The existence of net benefits to customers will be one measure of "public benefit."

c) Public Counsel objects to this request as it calls for Public Counsel to perform legal research for PSE.

d) Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

e) Public Counsel is preparing its analysis of the 'benefit streams' detailed on page 2 of the testimony of Dr. Faruqui, which were revised on April 25, 2016. Our analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 20

Request No.:	20
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 20 TO PUBLIC COUNSEL:
Public Counsel's Comments in this docket, submitted 11/9/2015, at page 2, posed the question, "Should a leasing program be offered as a regulated service?," however did not state a formal position on this matter.

Please state whether Public Counsel believes PSE should offer its Equipment Lease Service as a regulated service.

Please also provide all documents or analyses undertaken by or on behalf of Public Counsel, or relied on by Public Counsel, relating to PSE's proposed Equipment Lease Service being offered through a regulated as opposed to an unregulated entity.

RESPONSE:
Public Counsel also objects on the basis and to the extent that the request seeks information protected by the attorney-client privilege or the attorney work-product doctrine.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel believes that one of the issues in this case is whether PSE's Equipment Leasing Service should be offered as a regulated service. There are a number of arguments that can be made that leasing of the type of equipment included in the proposal, including the provision of maintenance contracts, is a competitive business in Washington, and should be provided by a separate non-regulated subsidiary.

Public Counsel will address this issue on brief at the appropriate time in the docket and provided supporting legal analyses and relevant supporting documents, and citations.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 21

Request No.:	21
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 21 TO PUBLIC COUNSEL:
Public Counsel's Comments in this docket, submitted 11/9/2015, at page 2, states that "some of the measures included in the original leasing tariff filing are not included in PSE's recently filed Biennial Conservation Plan."

Please provide the laws, rules, or policy documents that establish that any equipment offered under the proposed tariff schedules must meet specific energy efficiency product specifications, including being included in PSE's Biennial Conservation Plan.

RESPONSE:

Public Counsel objects to PSE Data Request No. 21 on the ground and to the extent that it asks Public Counsel to perform a legal analysis and provide legal conclusions.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

PSE's request assumes an incorrect premise. Public Counsel's comments, which addressed an earlier form of the proposal, were intended to point out a difference to the Commission which is relevant to the extent that PSE claims conservation benefits for the Leasing Service.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 22

Request No.:	22
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 22 TO PUBLIC COUNSEL:
Provide all documents in Your possession, custody or control relating to the leasing or rental of water heating and HVAC equipment by regulated utilities, including any advantages or disadvantages of offering such lease or rental services as a regulated rather than an unregulated service.

RESPONSE:
Public Counsel objects to PSE Data Request No. 22 as burdensome, duplicative, and overly broad. Public Counsel also objects on the basis and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery. Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 23

Request No.:	23
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 23 TO PUBLIC COUNSEL:
Is it Public Counsel's position that PSE's proposed Equipment Lease Service should be treated as a conservation program? Please explain Your answer, with justification and supporting data.

RESPONSE:
Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016. The testimony will address conservation issues.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 24

Request No.:	24
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 24 TO PUBLIC COUNSEL:
Provide all documents in your possession, custody or control relating to any consumer protection violations by water heating and HVAC contractors in Western Washington.

RESPONSE:
Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 25

Request No.:	25
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 25 TO PUBLIC COUNSEL:
Public Counsel's Comments in this docket, submitted 11/9/2015, at page 2, states that "it appears that several credit unions and banks are now offering a variety of financing options, including loans for energy efficient equipment and upgrades" and that "retailers also offer a range of financing options to customers."

Has Public Counsel undertaken an analysis as to the availability of each of the means set forth below? Provide all documents in Your possession, custody or control relating customer access to capital through the below means:

a) Retailers

b) Banks and credit unions

c) Trade allies and contractors

RESPONSE:
Public Counsel objects to PSE Data Request No. 25 as burdensome, duplicative, and overly broad. Public Counsel further objects on the ground and to the extent that the requested information is obtainable from sources more convenient, less expensive, and less burdensome since it is in PSE's possession, or is available in documents on file in the record of the proceeding, or in responses to data requests submitted by parties in this docket.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel is preparing its analysis of PSE's proposed Equipment Lease Program, and such analysis will be provided in Public Counsel's written testimony, with supporting documents in the form of exhibits and workpapers on June 7, 2016.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 26

Request No.:	26
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 26 TO PUBLIC COUNSEL:
Do you agree with the assessment of The Energy Project on p. 2 of its Comments in this docket, submitted 11/9/2015, that states "Households not eligible for LiWx [Low Income Weatherization] services in addition to not qualifying for traditional financing through a banking institution may benefit from the proposed leasing program"? Why or why not?

RESPONSE:
Public Counsel objects on relevance grounds. The referenced Comments of The Energy Project were made to the Commission when PSE's proposed leasing program had different terms and conditions than the proposal currently before the Commission and at a time when PSE had not yet filed any proposed prices for leased equipment. Public Counsel agreement or disagreement with the statement would have no direct relevance to the current proposal.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel's analyses of any issues pertaining to households not eligible for low-income weatherization under the leasing program will be provided in our testimony to be filed June 7, 2016, in this docket.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 27

Request No.:	27
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 27 TO PUBLIC COUNSEL:
Public Counsel's Comments in this docket, submitted 11/9/2015, at page 2 states that "it appears that several credit unions and banks are now offering a variety of financing options … often at rates lower than PSE's weighted average cost of capital."

Please identify whether its Public Counsel's position that PSE's proposed lease schedule should not be allowed to provide equipment lease services to customers using PSE's weighted average cost of capital to finance leased equipment, and what laws, rules, or policy documents inform this position?

RESPONSE:
Public Counsel objects to PSE Data Request No. 27 on the grounds that the request is burdensome and to the extent that the request seeks materials protected by the attorney-client privilege or the attorney work-product doctrine. Public Counsel further objects that the request asks Public Counsel to prepare and provide legal analysis and conclusions to the Company.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel's position regarding PSE's proposed lease schedule to provide equipment lease services to customers using PSE's weighted average cost of capital to finance leased equipment will be provided in our testimony to be filed June 7, 2016.

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RESPONSE OF PUBLIC COUNSEL TO PSE DATA REQUEST NO. 28

Request No.:	28
Directed to:	Simon J. ffitch
Date Received:	May 13, 2016
Date Produced:	May 27, 2016
Prepared by:	Simon J. ffitch/Mary M. Kimball

PUGET SOUND ENERGY DATA REQUEST NO. 28 TO PUBLIC COUNSEL:
Provide all documents or analysis undertaken by or on behalf of Public Counsel, or any documents or analyses relied on by Public Counsel, or any other documents or analysis in Your possession, custody or control, relating to Public Counsel's comments in this docket, submitted 11/9/2015, at page 2, which states that the proposed schedule is "somewhat unique due to the equipment maintenance component and payment through the utility bill."

RESPONSE:
Public Counsel objects to PSE Data Request No. 28 as burdensome and overly broad.

Without waiving these objections, and subject thereto, Public Counsel provides the following response:

Public Counsel has no documents responsive to this request beyond documents already filed in this proceeding, or provided by parties in discovery.

The leasing program is not entirely unique in the sense that Public Counsel understands that other programs provide for payment of energy efficient equipment through the utility bill (i.e. utility bill financing), such as the Craft3 partnership with Northwest Natural Gas discussed in Staff's Open Meeting Memo dated November 13, 2015. Any additional analysis or documents regarding the statement referenced above will be provided in Public Counsel's testimony and workpapers to be filed on June 7, 2016.