

EXHIBIT A

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKETS UE-151871 and UG-151872
(Consolidated)

**PUGET SOUND ENERGY’S THIRD
SET OF DATA REQUESTS THE
WASHINGTON STATE HEATING,
VENTILATION, AND AIR
CONDITIONING CONTRACTORS
ASSOCIATION (WSHVACCA)**

TO: WSHVACCA

Pursuant to WAC 480-07-405, Puget Sound Energy (“PSE”) requests that WSHVACCA produce the documents described below to the offices of Perkins Coie LLP, 10885 N.E. Fourth Street, Suite 700, Bellevue, WA 98004-5579, within ten (10) business days after service. The following definitions and instructions apply to these requests:

DEFINITIONS

1. The terms “You,” “Your,” “WSHVACCA,” or any similar word or phrase, means the Washington State Heating, Ventilation, and Air Conditioning Contractors Association, and, where applicable, includes without limitation each of its members, predecessors-in-interest, successors-in-interest, present or former parents, subsidiaries, divisions, branches, affiliated or controlled companies, joint ventures, and any entities acting or purporting to act for or on behalf of the foregoing or who are subject to the direction or control of the foregoing, including any present or former agents, employees, officers, directors, owners, insurance companies, attorneys, representatives, accountants, investigators, and consultants of the foregoing.

2. “Equipment Leasing Program” refers to PSE’s revisions to WN U-60 Schedule 75 and WN U-2 Schedule 175, to offer an electric and natural gas equipment lease service to its customers, filed on September 18, 2015, and any subsequent amended revisions or filings.

3. “HVAC equipment” means space heating, ventilation, and air conditioning equipment or appliances.

4. “Analysis or analyses” means any reviews, reports, studies, tests, computations, comparisons, calculations, estimates, appraisals, assessments, valuations, inquiries, investigations, evaluations or inquiries undertaken by a person, including any and formal or informal draft or final analyses and all documents related to such analyses.

5. “Identify,” means to:

- a. Describe with reasonable particularity;
- b. Identify each person believed to have knowledge with respect to the fact or event; and
- c. Identify each document that refers or relates to the fact or event.

6. “Identify,” when used with respect to a document, means to describe the document with sufficient particularity so as to provide the basis for a motion to compel production. In lieu of identifying a document in this manner, it will be sufficient to produce copies of the document.

7. “Communication” means any exchange or transmission of words or ideas to another person or entity, whether accomplished person to person, by telephone, in writing, via electronic mail, via social media or through another medium, and shall include, without limitation, discussions, conversations, negotiations, conferences, meetings, speeches, memoranda, letters, correspondence, notes, blogs, postings, and statements or questions.

8. “Document” means, without limitation, all tangible preservations of information, including writings, recordings, and photographs, along with all documents or electronically stored information, information preserved on computers, and any non-identical copies (whether

different from the originals because of notes made on such copies, because such copies were sent to different individuals, or for any other reason) and drafts.

9. “Person” means a natural person and, without limitation, firms, partnerships, corporations, associations, unincorporated associations, organizations, businesses, trusts, public entities, parent companies, subsidiaries, divisions, departments or other units thereof, and/or any other type of legal entity.

10. “Concerning,” “reflecting,” “regarding,” and “related to” mean, in whole or in part, reflecting, regarding, related to, relating to, in connection with, involving, supporting, addressing, analyzing, constituting, containing, commenting on, discussing, describing, identifying, referring to, reporting on, stating, dealing with, or in any way pertaining to.

INSTRUCTIONS

11. You are requested to produce all documents in Your possession, custody, care or control that are described below. In so doing, please furnish documents that are in the possession of Your partners, officers, employees, attorneys, accountants, representatives, or agents, or any other persons that are otherwise subject to Your custody, care or control.

12. Should WSHVACCA withhold any document or thing responsive to these requests, WSHVACCA is requested to state the basis for withholding the document or thing in a manner sufficient to enable PSE and the Commission to adjudicate the validity of WSHVACCA’s withholding, including, in the case of any document or thing withheld on the grounds of privilege or work product, the following information for each document or thing:

- a. the title of the document;
- b. the date appearing on the document, and if no date appears thereon, so state and give the date or approximate date on which the document was prepared;
- c. the type or general nature of the document (i.e., whether it is a letter, memorandum, minutes of a meeting, presentation, etc.);
- d. the name, title, and company affiliation of the person who prepared the document;

- e. the name, title and company affiliation of the person who signed the document, if any;
- f. the name, title, and company affiliation of each person to whom the document was disclosed, including the person to whom it was addressed and the person to whom the document, or copies of the document, were sent;
- g. the name, title and company affiliation of the person who maintained custody of the document; and
- h. the general subject matter of the document and the basis for withholding the document, in a manner sufficient for PSE and the Commission to determine the validity of Your claim of privilege and/or work product.

13. All documents that exist in electronic format should be produced in their native format, complete with all metadata. All documents that exist only in paper or other hard-copy format are to be produced in the order and structure as they are kept in the usual course of business.

14. Should WSHVACCA find the meaning of any term to be unclear, WSHVACCA should assume a reasonable meaning, state what that assumed meaning is, and respond to the request on the basis of that assumed meaning.

15. These data requests are deemed to be continuing in nature, and WSHVACCA is requested to amend or supplement its responses as is necessary to maintain the accuracy of WSHVACCA's responses. To that end, if WSHVACCA obtains additional responsive information at any time between the time for the initial response and the time of hearing, WSHVACCA shall promptly provide PSE with the supplemental response.

16. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

17. The use of the singular form of any word includes the plural, and the plural form of a word shall be interpreted as singular, whenever appropriate to bring within the scope any documents or information that might otherwise be considered beyond the scope of the request.

18. None of the definitions set forth above or requests below shall be construed as an admission relating to the existence of any evidence, to the relevance or admissibility of any evidence, or to the truth or accuracy of any statement or characterization in the definition of this request.

19. Unless otherwise stated, the relevant time period for which documents should be produced is January 1, 2013, to present.

DATA REQUESTS

PSE Data Request No. 024 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or any other documents or analysis in the possession of WSHVACCA, that addresses what specific material and service costs are typically included in a standard installation of:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 025 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or any other documents or analysis in the possession of WSHVACCA, that addresses what specific material and service costs are typically excluded in a standard installation of:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 026 to WSHVACCA:

If WSHVACCA provided an explanation of the specific material and service costs requested in PSE Data Request No. 25, would WSHVACCA define these excluded service and material costs as “non-standard installation costs”, and if so, what constitutes such non-standard installation costs for:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 027 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or any other documents or analysis in the possession of WSHVACCA, that provides an explanation of what specific material and service costs are typically included in a standard maintenance call for:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 028 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or any other documents or analysis in the possession of WSHVACCA, that provides an explanation of what specific material and service costs are typically excluded in a standard maintenance call for:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 029 to WSHVACCA:

If WSHVACCA provided an explanation of specific material and service costs requested in PSE Data Request No. 028, would WSHVACCA define these excluded service and material costs as “non-standard maintenance costs”, and if so, what constitutes such non-standard maintenance costs for:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 030 to WSHVACCA:

Does WSHVACCA believe its individual members can address a situation in which a customer needs to relocate equipment following installation? If so:

- a. Does WSHVACCA believe its individual members can perform the relocation?
- b. Does WSHVACCA believe its individual members might apply both standard and non-standard costs, as detailed in WSHVACCA response to Puget Sound Energy Data Requests Nos. 024 and 025, to the customer in such an event?

- c. How would such charges be disclosed to the customer?
- d. At what point would the customer be informed of the exact amount of such relocation charges?
- e. What options might be provided to the customer to manage how they pay for these charges?

PSE Data Request No. 031 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or any other documents or analysis in the possession of WSHVACCA, that detail failure rates for:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 032 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or any other documents or analysis in the possession of WSHVACCA, regarding remote monitoring, including use of built in Wi-Fi capabilities, for:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 033 to WSHVACCA:

Provide all documents or analyses undertaken by or on behalf of WSHVACCA, or any documents or analyses relied on by WSHVACCA, or any other documents or analysis in the possession of WSHVACCA, that details general service commitments by contractors associated with remote monitoring, including commitments to track abnormal usage or service issues through remote monitoring, for:

- a. Water heating equipment
- b. HVAC equipment

PSE Data Request No. 034 to WSHVACCA:

In the event remotely-monitored equipment fails in a manner causing equipment to operate considerably less efficiently, do the service commitments discussed in WSHVACCA response to

Puget Sound Energy Data Request No. 035 require contractors to compensate customers for additional energy use?

PSE Data Request No. 035 to WSHVACCA:

Does WSHVACCA believes its individual members would engage in the negotiation and execution of service only, material only, or service and material only contracts, as defined by the service partner paths outlined on pages 15-17 of the Prefiled Direct Testimony of Malcolm B. McCulloch, prior to the Commission order approving the proposed Schedules 75?

PSE Data Request No. 036 to WSHVACCA:

What are the typical timeframe, inputs or commitments WSHVACCA believes its individual members would expect when engaging in the negotiation and execution of:

- a. Service only contracts with third-party partners
- b. Material only contracts with third-party partners
- c. Service and material contracts with third-party partners

PSE Data Request No. 037 to WSHVACCA:

Upon Commission order approving Schedules 75, does WSHVACCA believe its individual members would have the capacity to “replace at least 28,000” of the units projected to have exceeded their useful life, in partnership with Puget Sound Energy, as detailed on page 2 of Puget Sound Energy’s November 6th, 2015 letter to Mr. Steven V. King?

PSE Data Request No. 038 to WSHVACCA:

Upon Commission order approving Schedules 75, does WSHVACCA believe its individual members would have enough trained staff available to handle the maintenance and repair services for the replaced units referenced in PSE Data Request No. 037, in the first five years of this service?