

EXHIBIT C

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)

INTERVENOR SMACNA-WW'S
OBJECTIONS AND RESPONSES TO
PUGET SOUND ENERGY'S DATA
REQUEST NOS. 001-024

TO: PUGET SOUND ENERGY, Respondent

AND TO: SHEREE STORM CARSON, PERKINS COIE LLP, counsel for Puget Sound
Energy

AND TO: ALL PARTIES, and their counsel of record

GENERAL OBJECTIONS

1. Intervenor Sheet Metal and Air Conditioning Contractors National Association, Western Washington (SMACNA-WW) objects to all instructions and requests to the extent they enlarge upon, supersede, or modify the rules of discovery set forth in WAC 480-07-400 – 425.

2. SMACNA-WW objects to any request to the extent it asks, or could be interpreted to ask, for information not in the possession, custody, or control of SMACNA-WW. Many of the data requests request information or responses from SMACNA-WW's members directly. Those individual members are not parties to this proceeding, and PSE has no authority under applicable

rules to obtain discovery from the members through the association's intervention in this matter. Moreover, SMACNA-WW has no authority to compel the production of such information from its members, and in some instances, may be prohibited from surveying pricing and other information based on federal antitrust laws pertaining to the activities of trade associations.

3. SMACNA-WW objects to any request asking for "analysis" or "analyses" to the extent the term "analysis" or "analyses" means anything more than is normally understood and present within relevant documents. In the definition of "analysis or analyses," PSE states that the terms include "inquiries undertaken by a person," including the term "inquiries" twice in the laundry list of terms. That posited definition would include simple questions like, "have you seen this?" within the term "analysis" or "analyses." Such requests would be overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. SMACNA-WW interprets the terms "analysis" and "analyses" in these data requests to mean the regular dictionary definition of a detailed examination of the elements or structure of something, typically as a basis for discussion or interpretation, and answers these requests accordingly.

4. SMACNA-WW objects to any request asking for communications between SMACNA-WW and its attorneys and attorney work product documents. PSE's definitions of "you" and "your" includes attorneys. By the terms of these broad definitions, PSE appears to be asking not only for attorney-client privileged information, but also seeking to impose a substantial burden on SMACNA-WW (and its attorneys) by requiring a privilege log for the most mundane of attorney-client emails. Referring back to the definition of "analysis" and "analyses," which includes "inquiries," PSE may be asking for any emails from SMACNA-WW's attorneys that ask a question. Such a request is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Further, such request would constitute an improper intrusion into attorney-client communications and confidential attorney work product. SMACNA-WW asserts that the way the above definitions are incorporated into

the data requests necessarily would require answers that invade the attorney-client relationship and attorney work product protections. SMACNA-WW hereby claims such privileges and protections and objects to these data requests on that basis. Based on the foregoing, SMACNA-WW interprets these requests as not to be seeking attorney-client privileged communication or attorney work product documents, and answers accordingly. Subject to claims of privilege and work product, SMACNA-WW will respond to appropriately narrowed data requests that seek non-privileged and non-protected documents reasonably calculated to lead to the discovery of admissible evidence and consistent with WAC 480-07-400 – 425, and that do not impose an undue burden, taking into account the relevance, needs of the case, limitations on the parties' resources, and the importance of the issues at stake. SMACNA-WW submits a privilege log accompanying these responses.

5. SMACNA-WW objects to any data request to the extent it calls for the production of documents "relating to" or that "relat[e] to" certain matters on the grounds that it does not describe the requested documents to be produced with sufficient particularity to allow SMACNA-WW to provide a meaningful response.

6. To the extent that any data request may be construed as calling for documents or information subject to a claim of privilege, including, without limitation, the attorney-client or attorney work product privilege, SMACNA-WW hereby claims such privilege and objects to such data request on that basis.

7. SMACNA-WW objects to the data requests to the extent they seek to obtain a version of SMACNA-WW's proposed testimony before the filing date of such testimony. After that testimony is filed, PSE may submit appropriate data requests in response to that testimony.

8. SMACNA-WW objects to the data requests to the extent they seek documents that are already in the position of PSE, or are otherwise publicly available through the website of the Washington Utilities and Transportation Commission (WUTC) in this docket.

9. The answers and responses set forth below represent SMACNA-WW's present knowledge, information, and belief based on discovery, investigation, and hearing preparation to date. Discovery, investigation, and hearing preparation are continuing. SMACNA-WW expressly reserves the right to rely, at the hearing, upon any further information adduced upon completion of discovery, investigation, and hearing preparation. Discovery in this matter is continuing and the SMACNA-WW reserves the right to change or supplement these answers and responses as new information is discovered.

10. To the extent that any data requests calls for the production of confidential information, production of such documents shall be subject to the terms and conditions of the Protective Order in this consolidated Docket, incorporated herein by this reference.

11. These General Objections are incorporated into each of the responses set forth below, which answers and responses are made without waiver of any of these General Objections.

DATED this 6th day of May 2016.

CASCADIA LAW GROUP PLLC

s/ Joseph A. Rehberger

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Attorneys for SMACNA-WW

DATA REQUESTS

[individual responses to Data Request Nos. 1-24 on following pages]

PSE DATA REQUEST NO. 001 TO SMACNA-WW:

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

RESPONSE:

Sheet Metal & Air Conditioning Contractors National Association, Western Washington Chapter (SMACNA-WW) is a trade association and a local chapter of the Sheet Metal & Air Conditioning Contractors National Association, which is located in Chantilly, Virginia. SMACNA-WW is comprised of approximately 60 contractors and members doing business in Western Washington. A separate chapter represents contractors and members in Eastern Washington. SMACNA-WW does not exercise any control over the independent operations of its members. Accordingly, SMACNA-WW objects to this data request to the extent it calls for all "documents" or "analysis undertaken" by its individual members, which information is not in the possession, custody, or control of SMACNA-WW.

SMACNA-WW objects to this data request to the extent it asks for all documents "relating" to PSE's proposed Equipment Lease Program on the grounds that it does not describe the requested documents to be produced with sufficient particularity to allow SMACNA-WW to provide a meaningful response. Such a request would include counsel's entire file in this case, scheduling and other emails, and a significant number of documents equally available to PSE. Further, the breadth of such request is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving its objections, SMACNA-WW provides those documents included on the enclosed CD in response to this Data Request (DR) No. 001.

SMACNA-WW further responds that the breadth of this request encompasses potentially hundreds of independent emails from and to SMACNA-WW's legal counsel in this matter and between the parties and their respective counsel to this action. SMACNA-WW interprets this request as not seeking these correspondences. SMACNA-WW further interprets this requests as not to be seeking attorney-client privileged communication or attorney work product documents, and answers accordingly. In addition to the above objection and clarification, SMACNA-WW also produces herewith a privilege log pertaining to privileged and confidential attorney-work product documents.

SMACNA-WW is continuing to review electronic and other files in response to this request, and reserves the right to change or supplement these answers and responses, including to make additions to the privilege log, as new information is discovered.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 002 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analyses relied on by SMACNA-WW, 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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW provides those documents included on the enclosed CD in response to this Data Request (DR) No. 002.

By way of further response, SMACNA-WW states that it provides numerous management and supervisory programs each year that provide educational opportunities on technical, safety, or a variety of related topical programs that assist the contractor and their employees in providing a high quality product to the customer. Technical standards and manuals, developed by SMACNA Contractors provide, and are accredited by ANSI, the American National Standards Institute, as a standards-setting organization. SMACNA standards and manuals address all facets of the sheet metal and HVAC industry--including duct construction and installation, indoor air quality, energy recovery, roofing and architectural sheet metal, welding, and commissioning. A listing of current editions of SMACNA manuals include the following, and an index by topic, including reference to prior and superseding editions, is set forth below:

Accepted Industry Practice for Industrial Duct Construction 2nd, 2008
Accepted Industry Practices for Sheet Metal Lagging 1st, 2002
Architectural Sheet Metal Inspection Guide 1st, 2004
Architectural Sheet Metal Manual 7th, 2012
Building Systems Analysis & Retrofit Manual 2nd, 2011
Ducted Electric Heat Guide for Air Handling Systems 2nd, 1994
Energy Systems Analysis & Management 1st, 1997 (Superseded Energy Conservation Guidelines, Energy Recovery Equipment & Systems)
Fibrous Glass Duct Construction Standards 7th, 2003
Amendment: 1983, 6th ed: 1992
Fire, Smoke & Radiation Damper Installation Guide for HVAC Systems 5th, 2002
Guide for Free Standing Steel Stack Construction 3rd, 2011
Guyed Steel Stacks 1st, 2011
HVAC Air Duct Leakage Test Manual 2nd, 2012 (approved as an ANSI Standard in 2012)
HVAC Duct Construction Standards - Metal and Flexible 3rd, 2005 (Previous separate manuals were Low Pressure, Low Velocity, High Velocity, High Pressure Duct Construction)

HVAC Duct Systems Inspection Guide 3rd, 2006
HVAC Sound and Vibration Manual 1st, 2004
HVAC Sound and Vibration Procedural Guide 1st, 2013
HVAC Systems - Applications 2nd, 2010
HVAC Systems - Commissioning Manual 2nd, 2013
HVAC Systems - Duct Design 4th, 2006
HVAC Systems - Testing, Adjusting & Balancing 3rd, 2002
IAQ Guidelines for Occupied Buildings Under Construction 2nd, 2007
Indoor Air Quality - A Systems Approach 3rd, 1998
Kitchen Ventilation Systems & Food Service Equipment Guidelines 1st, 2001 (Kitchen Equipment Manual)
Rectangular Industrial Duct Construction Standards 2nd, 2004 (approved as ANSI Standard in 2011)
Residential Comfort System Installation Standards Manual 7th, 1998 (Installation Standards for Residential HVAC)
Residential Sheet Metal Guidelines 1st, 2001 (Condensed version of 5th edition of the Architectural Sheet Metal Manual)
Round Industrial Duct Construction Standards 2nd, 1999
Seismic Restraint Manual - OSHPD Edition 1st, 2009
Seismic Restraint Manual: Guidelines for Mechanical Systems 3rd, 2008
Sheet Metal Welding Guide 3rd, 2007 (Managers' Guide for Welding)
Standard Practice in Sheet Metal Work 1st, 1929
TAB Procedural Guide 1st, 2003 Primary content taken from Chapters 12-16, of the HVAC Systems TAB Manual
Thermoplastic Duct (PVC) Construction Manual 2nd, 1995
Thermoset FRP Duct Construction Manual 1st, 1997

These manuals collectively constitute over 7,800 pages, and are considered proprietary in nature to SMACNA. Public release and dissemination of electronic versions of these documents would impose a highly significant risk of competitive harm. By this response, SMACNA-WW offers to make these documents available to counsel of record for review upon request. Please contact the undersigned counsel to arrange for a mutually agreeable time and place for inspection, or to facilitate electronic inspection, if preferred. If future production of actual copies of these manuals is requested, SMACNA-WW would designate such documents as confidential or highly confidential subject to the terms and conditions of the Protective Order in this consolidated docket, incorporated herein by this reference.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 003 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, 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 SMACNA-WW and its individual members.

(Refer to Petition to Intervene by SMACNA-WW, paragraphs 4, 6, 10)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW provides those documents included on the enclosed CD in response to this Data Request (DR) No. 003.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger

(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 004 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, 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 SMACNA-WW or its individual members. (Refer to Petition to Intervene by SMACNA-WW, paragraphs 4, 6, 10)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW incorporates by references its response to PSE Data Request No. 003 and the documents produced in response thereto.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 005 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, 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 SMACNA-WW'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 SMACNA-WW 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 SMACNA-WW or any individual member, including any marketing or promotional materials; and
- e) a listing of all SMACNA-WW 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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide financing options to customers for water heating and HVAC equipment and does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 006 to SMACNA-WW:

Provide all documents relating to the terms of any financing options offered by SMACNA-WW 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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide financing options to customers for water heating and HVAC equipment and does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 007 to SMACNA-WW:

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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

SMACNA-WW further objects to this data request to the extent the definition of "Your" means anything other than SMACNA-WW, and specifically to the extent it purports to refer to each of SMACNA-WW's individual members. Such documents and information are not in the possession, custody, or control of SMACNA-WW.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide financing options to customers for water heating and HVAC equipment and does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 008 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, or any individual member, or any other document 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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide leasing or rental options for water heating and HVAC equipment and, other than those documents already produced in response to DR No. 001 or the information provided in response to the UTC Staff Data Requests Nos. 2-6, that it does not possess other documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 009 to SMACNA-WW:

Provide all documents sufficient to show which SMACNA-WW 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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide leasing or rental programs for water heating and HVAC equipment, and other than those documents already produced in response to DR No. 001 or the information provided in response to the UTC Staff Data Requests Nos. 2-6, that it does not possess other documents responsive to this request.

SMACNA-WW is continuing to conduct discovery, prepare testimony, and prepare for hearing in this matter, and reserves the right to change or supplement these answers and responses as new information is discovered. Further, information responsive to this request may be developed in testimony that may be filed with the Commission.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 010 to SMACNA-WW:

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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status. SMACNA-WW further objects to this data request as to the definition of "Your" meaning anything other than SMACNA-WW, and specifically to the extent it purports to refer to each of SMACNA-WW's individual members. Such documents and information are not in the possession, custody, or control of SMACNA-WW.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide leasing or rental of water heating and HVAC equipment, and other than those documents already produced in response to DR No. 001 or the information provided in response to the UTC Staff Data Requests Nos. 2-6, that it does not possess other documents responsive to this request.

SMACNA-WW is continuing to conduct discovery, prepare testimony, and prepare for hearing in this matter, and reserves the right to change or supplement these answers and responses as new information is discovered. Further, information responsive to this request may be developed in testimony that may be filed with the Commission.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 011 to SMACNA-WW:

Provide the total number of water heating and HVAC equipment sales and installations performed by SMACNA-WW'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 SMACNA-WW, paragraphs 2, 4, 6)

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

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide equipment sales and installations and does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 012 to SMACNA-WW:

Provide the total number of water heating and HVAC equipment maintained, serviced or repaired (not installed) by SMACNA-WW'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 SMACNA-WW, paragraphs 2, 4, 6)

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

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide HVAC equipment maintenance, service or repairs and does not possess information or documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 013 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, or its individual members, or any other documents or analysis, relating to the pursuit of cost-effective energy conservation. (Refer to Petition to Intervene by SMACNA-WW, paragraph 5)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW provides those documents included on the enclosed CD in response to this DR No. 013. SMACNA-WW further incorporates by reference its response to DR No. 002.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 014 to SMACNA-WW:

Describe what SMACNA-WW means by “energy management services.”
(Refer to Petition to Intervene by SMACNA-WW, paragraph 2)

RESPONSE:

Energy management and energy management services, energy efficient design, and energy systems analysis can be used interchangeably to describe all energy-related practices and opportunities for contractors working on commercial, residential, and institutional buildings to evaluate an existing facility for energy savings potential in both new construction and retrofit applications. This also includes energy conservation management, the energy audit and energy estimating procedures, HVAC system maintenance and indoor air quality, energy management maintenance and monitoring, energy recovery systems, and energy recovery system investment analysis.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 015 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, or its individual members, or any other documents or analysis, relating to its “energy management services.”

(Refer to Petition to Intervene by SMACNA-WW, paragraph 2)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW’s trade association status.

Subject to and without waiving its objections, SMACNA-WW provides the documents included on the enclosed CD in response to this DR No. 015. SMACNA-WW further incorporates by reference its response to DR No. 002.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 016 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, or its individual members, or any other documents or analysis, sufficient to show the average rates or prices for SMACNA-WW'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 SMACNA-WW, paragraphs 2, 4, 6)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW states that it does not provide services, including the sale or lease, installation, maintenance, or servicing of water heating and HVAC equipment, and hence does not have average rates or prices related to the same.

SMACNA-WW does not possess documents responsive to this request.

SMACNA-WW is continuing to conduct discovery, prepare testimony, and prepare for hearing in this matter, and reserves the right to change or supplement these answers and responses as new information is discovered. Further, information responsive to this request may be developed in testimony that may be filed with the Commission.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 017 to SMACNA-WW:

Provide a list all of current SMACNA-WW 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.

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number

RESPONSE:

Subject to and without waiving its objections, SMACNA-WW provides the following list of SMACNA-WW members:

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number
4 Seasons Mechanical, Inc.	22615 112th St. E Buckley, WA 98321			
Ablitt Metal Products, Inc.	1727 Pennsylvania Avenue North Bremerton, WA 98337-1198			
ACCO Engineered Systems	835 N. Central Ave. Suite 132 Kent, WA 98032			
Accu Duct Manufacturing	316 Ellingson Road Algona, WA 98001			
Air Handlers, Inc.	PO Box 4036 Tumwater, WA 98501			
Air Management Solutions LLC	5822 W Werner Road Bremerton, WA 98312			
Airflow Mechanical, Inc.	224 192nd St. SW Bothell, WA 98012			
Air-Go	PO Box 3181 Lacey, WA 98509			
AIRTEST Co., Inc.	PO Box 86 Issaquah, WA 98027			
American Air Measurement	19338 NE 200th Street Woodinville, WA 98077			
Americool Heating & A/C LLC	17929 Irwin St. SW Rochester, WA 98579			
Angeles Heating Inc.	3322 E Hwy. 101 Port Angeles, WA 98362			
Apollo Mechanical Contractors	4230 B Street NW Auburn, WA 98001			
Architectural Sheet Metal Inc.	11220-164th St. E Puyallup, WA 98374			

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number
Argo Blower & Mfg. Co.	5400 E. Marginal Way S Seattle, WA 98134			
Associated Heating & Sheet Metal	PO Box 309 Monroe, WA 98272			
Auburn Mechanical, Inc.	2623 West Valley Hwy N Auburn, WA 98001			
Ballard Sheet Metal Works, Inc.	4763 Ballard Ave. NW Seattle, WA 98107			
Bellevue Mechanical, Inc.	1331 120th Ave. NE Bellevue, WA 98005			
Blue Mountain Mechanical, Inc.	9227 A Blue Mt Lane SW Olympia, WA 98512			
Capital Heating and Cooling	1218 Carpenter Rd. SE Lacey, WA 98503			
Capitol Strategies	3905 Lakehills Drive SE Olympia, WA 98501			
Cascade Metal Systems Inc.	23109 Locust Way Bothell, WA 98021-9234			
Chehalis S/M & Roofing Co., Inc.	350 SW Riverside Drive Chehalis, WA 98532			
CJ HVAC Consulting	1000 Town Center Suite 180 Tacoma, WA 98422-1194			
Code Mechanical, Inc.	26319 149th St. E Buckley, WA 98321			
Control Contractors	5300 Denver Ave. South Seattle, WA 98108			
Cool Air Refrigeration, LLC	1100 Dexter Ave #100, Seattle, WA 98109			
Crescent Sheet Metal, Inc.	1320 26th NW #16 Auburn WA 98001			
D & G Mechanical Insulation, Inc.	PO Box 1330 Sumner, WA 98390			
D.J. Mechanical	5716 119th Avenue NE Lake Stevens, WA 98258			
D/B Solutions, LLC	2100 196th St SW, Suite 122 Lynnwood, WA 98036			
DARDA Fabrication	11411 194th St. Ct. E Graham, WA 98338			
Day & Night Mechanical Heating & Cooling, Inc.	17024 Pacific Ave. S Spanaway, WA 96387			
DeaMor Associates, Inc.	14010A NE 3rd Court, Suite 102 Vancouver, WA 98685			
Delta Engineering Corporation	1223 Valentine Ave. SE Pacific, WA 98047			
Delta Technology Corp.	1223 Valentine Ave. SE Pacific, WA 98047			
Design Air, Ltd.	3051 East Valley Road Renton, WA 98057			

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number
Design Energy Products	PO Box 1966 Grass Valley, CA 95945			
Dick Tracy Enterprises	20822 96th Pl. South Kent, WA 98031			
DKG Fabrication, Inc.	6830 NE Bothell Way Suite C-34 Kenmore, WA 98028			
Duncan Air, LLC	1256 Satsop Road West Montesano, WA 98563			
E.J. Bartells	700 Powell Ave SW Renton, WA 98057			
E.P. Air Quality Living Systems, LLC	625 101st PL SE, Unit C Everett, WA 98208			
East Side Glass & Pt. Co., Inc.	11155-120th Ave NE #100 Kirkland, WA 98083			
ECCO Heating Products Ltd	20001 87th Ave South, Building E Kent, WA 98031			
Emerald Aire, Inc.	5108 "D" Street NW Auburn, WA 98001			
Engel Mechanical, Inc.	18080 NE 68th St Ste D160 Redmond, WA 98052			
Enhanced Visions	2703 32nd Ave SE Puyallup, WA 98374			
Enviromech	430 SW 153rd St. Seattle, WA 98166			
Environmental Design, Inc.	25328 SE 200th St Maple Valley, WA 98038			
Evergreen State Heat & AC	2120 Pacific Ave. Everett, WA 98201			
Fleming Consulting Services Inc.	14601 226th Ave. NE Woodinville, WA 98077			
Fluid Mechanical, Inc.	1207 W. Columbia Dr. Kennewick, WA 99336			
Foster & Bray	PO Box 2790 Issaquah, WA 98027			
Frederickson Sheet Metal	1604 W. Sixth Aberdeen, WA 98520			
GB Systems, Inc.	7202 NE 175th St. Kenmore, WA 98028			
Glacken Fabrication dba Northwest Sheet Metal	15143 140th Ln. SE Yelm, WA 98597			
H & N Sheet Metal	PO Box #5 Longview, WA 98632			
H & R Mechanical Systems, Inc.	PO Box 5486 Everett, WA 98206			
Hammer Construction	12018 178th Ave. East Bonney Lake, WA 98391			
Harbor Ventilation, Inc.	701 E. Market St. Aberdeen, WA 98520			

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number
Hardin & Sons, Inc.	2120 Meridian Avenue E Edgewood, WA 98371			
Harris & Hart	3906 B Street NW Auburn, WA 98001			
Hawk Mechanical Contractors, Inc.	PO Box 547 Monroe, WA 98272			
Heavy Metal Works	PO Box 515 Langley, WA 98260			
Hermanson Company, LLP	1221 2nd Avenue N Kent, WA 98032			
Holiday-Parks, Inc.	4600 S. 134th Pl Seattle, WA 98168			
Holmberg Company	1128 8th St. Kirkland, WA 98033			
HQ Construction Services, LLC	318 W Woodworth St. Sedro Wooley, WA 98284			
Integrated Systems	PO Box 1386 Woodinville, WA 98072			
J.E.M. Contractors	12805 Shorewood Dr. SW Burien, WA 98146			
Johansen Mechanical, Inc.	20109 144th Ave NE Woodinville, WA 98072			
JW Brower Heating & A/C	3424 South Tacoma Way Tacoma, WA 98409			
KBK Mechanical	39620 272nd Ave. SE Enumclaw, WA 98022			
Kenco Construction, Inc.	PO Box 70568 Seattle, WA 98127			
Kessler Brother's Constr.	2360 Fawcett Street Tacoma, WA 98402			
Kinssies, R.G. & Co., Inc.	13421 Ambaum Blvd SW Burien, WA 98146			
Kohler Heating	3026 14th Ave. Gig Harbor, WA 98335			
Kollmar Sheet Metal	941 S. Nebraska St. Seattle, WA 98108			
Krueger Sheet Metal Co.	PO Box 2963 Spokane, WA 99220			
L & M Sheet Metal Fabricators	9005 192nd Street SE Snohomish, WA 98296			
Lacey Glass	1210 Homann Drive SE Lacey, WA 98503			
Lakebay Mechanical	17313 17th Street Court KP South Lakebay, WA 98349-9209			
Lancaster Heating, Inc.	300 Stankey Road Castle Rock, WA 98611			
Lyons Mechanical, LLC	5608 96th St. E Puyallup, WA 98371			

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number
MacDonald-Miller Facility Solutions, Inc.	7717 Detroit Ave. SW Seattle, WA 98106			
Magno Pacific, Inc.	8800 SW Commercial Tigard, OR 97223			
Marina Heating & A/C	5306 141st St. Ct. NW Gig Harbor, WA 98332			
McKinstry Co.	5005 3rd Avenue South Seattle, WA 98134			
MD Exteriors, Inc.	1420 80th St. SW, Suite F Everett, WA 98203			
Metal Wright	PO Box 667 Brewster, WA 98812			
Miller Sheetmetal, Inc.	1642 Navy Yard Hwy. Bremerton, WA 98312			
Miller's Smith & Losli Sheet Metal	PO Box 385 Aberdeen, WA 98520			
Morgan Mechanical LLC	7229 212th St. SW Suite B Edmonds, WA 98026			
Moses Lake Sheet Metal	PO Box 550 Moses Lake, WA 98837			
N.W. Mountain Air, Inc.	900 Meridian E. Suite #19-445 Milton, WA 98354-7001			
N.W. Spiral, Inc.	1727 Pennsylvania Ave. Bremerton, WA 98337			
Neudorfer Engineers, Inc.	5516 1st Ave. South Seattle, WA 98108			
Northwest Metal Solutions, LLC	2816 Harris Street Road Kelso, WA 98626			
Northwest S/M (NFG, LLC)	PO Box 1650 Mukilteo, WA 98275			
Ocean Aire Contracting	2839 Marvin Road NE Olympia, WA 98516			
Olympia Sheet Metal, Inc.	2661 N. Pearl S., PMB 365 Tacoma, WA 98407			
Orion Sheet Metal, Inc.	PO Box 191 Puyallup, WA 98371			
Pacific Coast Heating & Sheet Metal	2100 196th St. SW Suite 123 Lynnwood, WA 98036			
Pacific Mechanical Systems, Inc.	18012 Bothell-Everett Hwy, Suite 6 Bothell, WA 98012-68885			
Pacific Rainer Roofing, Inc.	11119 Valley Ave. E Puyallup, WA 98372			
Phoenix Mechanical, Inc.	2839 Marvin Road NE Olympia, WA 98516			
Pinchiff Mechanical LLC	650 S Lucile St Seattle, WA 98108			
Plumbing & Mechanical	1501 15th Street NW #101			

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number
Contractors Group	Auburn, WA 98001			
Poulsbo Sheet Metal, Inc.	PO Box 310 Poulsbo, WA 98370			
Powell Sheet Metal LLC	PO Box 874 Port Orchard, WA 98366			
PP & S Heating & Ventilation	12022 98th Avenue NE Kirkland, WA 98034			
Precision Heating & Air Conditioning, Inc.	817 Kensington Ave. S Kent, WA 98030			
Precision Mechanical Solutions	109 Smith Dr. Chehalis, WA 98532			
Premier Stainless Installations	1010 South 129th Street Tacoma, WA 98444			
PSF Mechanical, Inc.	11621 East Marginal Way South Seattle, WA 98168			
PSR Mechanical	PO Box 27073 Seattle, WA 98125			
Queen City Sheet Metal & Roofing	22030 84th Ave. S Kent, WA 98032			
R.G. Kinnssies	13421 Ambaum Blvd. SW Seattle, WA 98146			
Refrigeration Unlimited, Inc.	6102 North 9th Street, Suite 100 Tacoma, WA 98406			
Ricketts Metal Mfg., Inc.	6720 Fleming Road Everett, WA 98203			
Right On Heating & Sheet Metal	PO Box 758 Lake Stevens, WA 98258			
Rogue Architectural Metals, Inc.	10019 50th Place W Mukilteo, WA 98275			
RS Analysis	1035 Suncast Lane Suite 130 El Dorado Hills, CA 95762			
RSB Construction	P.O. Box 968 Spanaway, WA 98387			
RSI	PO Box 699 Mount Vernon, WA 98273			
S & S Metal Fabrication, Inc.	1551 S. Tacoma Way Tacoma, WA 98409			
Schmitt's Sheet Metal & Roofing	32 Prospect Place Port Angeles, WA 98362			
Schnedier-Simpson	1551 S. Tacoma Way Tacoma, WA 98409			
Scott & From Co., Inc.	3820 South Junett Tacoma, WA 98409			
Seattle's Best Plumbing and Heating	11002 Marine View Drive SW Seattle, WA 98146			
Select Mechanical & Design	13300 Bothell Everett Hwy #PMB6 Mill Creek, WA 98012			

SMACNA-WW Member	Primary Address	Business License Number	L & I License Number	Contractor License Number
Shinn Mechanical, Inc.	18802 80th Ave. South Kent, WA 98032			
Summit Contracting LLC	2037 S. 4130 West, Suite E Salt Lake City, UT 84104			
Sunset Air, Inc.	5210 Lacey Blvd. Lacey, WA 98503			
Sustainable Works	649 Strander Blvd. Suite B Tukwila, WA 98188			
Tacoma Architectural Metals	PO Box 97056 Tacoma, WA 98497			
Temp Control Mech. Service (TCMS)	8310 30th Avenue NE Lacey, WA 98516			
Tim's Mechanical Plus	23969 NE State Route 3, Suite G #61 Belfair, WA 98528			
Todd Consulting	3764 N. Rowen Mesa, AZ 85207			
Tri-Mechanical	1824 130th Ave NE, Suite #1 Bellevue, WA 98005			
Trico Plumbing & Heating	3078 N. Goldie Road Oak Harbor, WA 98277			
Truepoint Metal Works & Welding	9616 James Road Rochester, WA 98579			
U.S. Sheet Metal Company, Inc.	1325 South Tacoma Way Tacoma, WA 98409			
University Mechanical Contractors, Inc.	11611 49th Place West Mukilteo, WA 98275			
Uptown Mechanical	2223 202nd St. SW Lynnwood, WA 98036			
Vital Mechanical Service, Inc.	1420 Maple Av. SW Renton , WA 98057			
Western Washington Heating & A/C LLC	11311 Cowlitz Dr. SE Olympia, WA 98501			
Williams Mechanical	3903 Smith Avenue Everett , WA 98201			
Zuiderweg Construction, LLC	20606 101st Ave. NE Arlington, WA 98223			

SMACNA-WW members' respective business license is available, without limitation, through the State of Washington Department of Revenue, and their respective labor and industries contractor license number is available through the State of Washington Department of Labor & Industries. Both the Department of Revenue (www.dor.wa.gov) and the Department of Labor & Industries (www.lni.wa.gov) online web resources, both of which provide for online search functions to access this information. Such information is equally obtainable by PSE from these other sources.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger

(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 018 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis, relied on by SMACNA-WW, 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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 019 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, or its individual members, or any other documents or analysis, relating to SMACNA-WW'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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 020 to SMACNA-WW:

For all sales of water heating and HVAC equipment in Western Washington by SMACNA-WW'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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger

(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 021 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, or its individual members, or any other documents or analysis, relating to SMACNA-WW'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 SMACNA-WW, paragraph 4)

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 022 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, 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:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016

PSE Data Request No. 023 to SMACNA-WW:

Provide all documents or analyses undertaken by or on behalf of SMACNA-WW, or any documents or analysis relied on by SMACNA-WW, 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 include lease options include equipment repairs, scheduled maintenance and replacement during the lease term.

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW does not possess documents responsive to this request.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger

(360) 787-5057

Dated: May 6, 2016

PSE Data Request No. 024 to SMACNA-WW:

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

RESPONSE:

SMACNA-WW incorporates by reference its response and objection to PSE Data Request No. 001 regarding SMACNA-WW's trade association status.

Subject to and without waiving its objections, SMACNA-WW incorporates by reference its response to PSE Data Request No. 001 and the documents produced in response thereto.

Witnesses knowledgeable about and who can respond to questions concerning the response include Julie Muller-Neff and others to be determined.

Prepared by: Joseph A. Rehberger
(360) 787-5057
Dated: May 6, 2016