

**EXH. LCM-6
DOCKET UE-210795
2022 PSE CEIP
WITNESS: LAUREN C. MCCLOY**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of
PUGET SOUND ENERGY, INC.
2021 Clean Energy Implementation Plan

Docket UE-210795

**FIFTH EXHIBIT TO THE PREFILED RESPONSE TESTIMONY OF
LAUREN C. MCCLOY
ON BEHALF OF NW ENERGY COALITION AND FRONT AND CENTERED**

OCTOBER 10, 2022

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-210795
Puget Sound Energy
PSE 2021 Clean Energy Implementation Plan**

FRONT AND CENTERED AND NW ENERGY COALITION DATA REQUEST NO. 152:

DATA REQUESTS DIRECTED TO: Kara Durbin

Topic: RENEWABLE ENERGY TARGETS

Please provide the costs and nameplate capacity of renewable energy resources bids received in response to PSE's All-Source Request for Proposals.

Response:

Puget Sound Energy ("PSE") objects to Front and Centered ("FAC") and NW Energy Coalition's ("NVEC") Data Request ("DR") No. 152 to the extent it seeks to expand PSE's obligations under the discovery rules set forth in WAC 480-07-400 through WAC 480-07-425. WAC 480-107-035(5) contemplates that such detailed, request for proposal ("RFP") data shall remain confidential and instead a generic summary is to be provided. PSE further objects to FAC and NVEC's DR No. 152 to the extent it calls for the disclosure of highly confidential information. Such highly confidential RFP data will be produced only after the entry of a suitable protective order.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-210795
Puget Sound Energy
PSE 2021 Clean Energy Implementation Plan**

FRONT AND CENTERED AND NW ENERGY COALITION DATA REQUEST NO. 154:

DATA REQUESTS DIRECTED TO: Kara Durbin

Topic: RENEWABLE ENERGY TARGETS

For any resources identified in the response to Request No. 153, please describe how the difference in cost assumptions would affect the renewable energy target.

Response:

Puget Sound Energy (“PSE”) objects to Front and Centered (“FAC”) and NW Energy Coalition’s (“NVEC”) Data Request (“DR”) No. 154 to the extent it seeks to expand PSE’s obligations under the discovery rules set forth in Washington Administrative Code (“WAC”) 480-07-400 through WAC 480-07-425. WAC 480-107-035(5) contemplates that such detailed, request for proposal (“RFP”) data shall remain confidential and instead a generic summary is to be provided. PSE further objects to FAC and NVEC’s DR No. 154 to the extent it calls for the disclosure of highly confidential information. Such highly confidential RFP data will be produced only after the entry of a suitable protective order.