

Exhibit DTA-21
PSE Response to IBEW Data Request No. 023,
Attachment A (PSE Worst Performing Circuits List)

TESTIMONY OF

D. Timothy Arnold

In Opposition to the Multiparty Settlement Stipulation on Behalf of IBEW 77

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket U-180680
Sale of Non-Controlling Interest in Puget Holdings LLC**

IBEW LOCAL 77 DATA REQUEST NO. 023

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Please identify the electrical circuits with the worst service reliability (highest frequency of outages) over the last ten years, including the number of outages and the length of each outage.

Response:

Each of the Joint Applicants object to IBEW Local 77 Data Request No. 023 as beyond the scope of IBEW Local 77's participation in this matter as provided by the WUTC in Prehearing Order 03, paragraph 23, which limits IBEW Local 77's participation as follows:

IBEW . . . will be limited to matters specifically addressing the safety and reliability of service to customers where its members are actually involved in the provision of such service. However, in the event it becomes clear later in the proceeding that either UA Local 32's or IBEW's continued participation is not in the public interest, the Commission has authority to dismiss either, or both, as an intervenor.

Each of the Joint Applicants also object to IBEW Local 77 Data Request No. 023 as not likely to lead to the discovery of evidence relevant to the possible harms associated with the Proposed Transactions and as overbroad and unduly burdensome because it requests information for the past ten years.

Without waiving these objections and subject thereto, Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 023 contains information for Puget Sound Energy ("PSE") electrical circuits that were designated by PSE in 2017 as a "worst performing circuit." The data relating to those circuits provided in this response covers the 2014 to 2018-time period.

**ATTACHMENT A to
the Joint Applicants' Response to
IBEW Local 77 Data Request No. 023**

Cumulative Number of Outages 2014-2018			
Circuit	Non-MED	MED	Total
AIR-23	131	45	176
ALG-12	117	30	147
ALG-15	262	78	340
AVO-15	126	15	141
BCH-15	70	18	88
BDI-13	93	41	134
BEL-26	20	1	21
BIG-15	198	57	255
BLA-12	34	11	45
BLA-13	205	60	265
BLU-16	159	28	187
BLU-17	143	27	170
BRS-24	226	64	290
BRW-13	81	8	89
CEK-14	107	37	144
CHA-13	94	15	109
CHA-15	95	25	120
CHI-12	346	112	458
CHR-22	65	38	103
CHR-23	44	19	63
CLE-11	159	8	167
COT-13	191	52	243
COT-15	83	40	123
CTR-22	78	5	83
DGR-15	102	37	139
DUV-12	181	34	215
DUV-15	245	57	302
ELD-25	170	44	214
ELD-27	109	35	144
ETN-13	164	7	171
EVE-13	13	-	13
FAL-15	173	40	213
FCR-14	22	9	31
FLD-12	202	64	266
FLD-13	161	60	221
FLD-15	170	31	201
FNW-16	194	50	244
FNW-17	268	80	348
FRA-12	159	82	241
FRA-13	165	75	240
FRA-15	152	76	228
FRA-16	163	57	220
FRG-24	147	32	179
GAR-16	63	16	79
GBK-13	165	55	220

Cumulative Number of Outages 2014-2018			
Circuit	Non-MED	MED	Total
GOO-15	5	2	7
GRI-13	192	43	235
GRI-16	185	30	215
GRV-15	71	14	85
GWR-13	95	20	115
GWR-16	139	18	157
HAM-15	170	57	227
HAP-16	159	35	194
HKX-16	202	54	256
HOB-15	232	45	277
HOB-16	176	55	231
HYA-13	67	5	72
ING-13	113	40	153
ING-15	205	46	251
KEN-12	199	98	297
KIN-24	264	96	360
KNM-23	121	29	150
KNM-26	138	20	158
KNO-11	32	-	32
LEA-17	33	6	39
LGY-12	140	50	190
LGY-15	52	20	72
LGY-16	288	95	383
LLS-17	65	11	76
LLT-13	76	16	92
LMD-15	76	6	82
LOL-21	159	71	230
LOL-23	91	35	126
LON-17	172	36	208
LON-25	138	31	169
LTA-17	43	19	62
LTA-18	112	24	136
LUH-14	188	57	245
LWS-14	52	13	65
MAN-15	85	26	111
MCA-15	29	17	46
MIL-17	214	74	288
MIL-22	85	46	131
MIL-23	132	64	196
MKI-17	96	14	110
MOT-14	89	28	117
MVW-13	137	34	171
MVW-17	51	7	58
NLM-15	68	12	80
NUG-26	351	150	501

Cumulative Number of Outages 2014-2018				
Circuit	Non-MED	MED	Total	
ORC-13	70	12	82	
ORT-22	137	26	163	
PAT-15	164	45	209	
PGA-12	134	48	182	
PGA-13	172	71	243	
PGA-16	18	4	22	
PIK-21	83	26	109	
PMA-12	158	67	225	
POU-13	91	45	136	
POU-15	166	88	254	
PRI-13	191	51	242	
PTR-14	172	31	203	
PTR-16	74	11	85	
RAI-13	165	34	199	
SEM-13	20	8	28	
SEQ-16	61	2	63	
SHD-18	243	61	304	
SHE-16	56	9	65	
SIL-13	90	51	141	
SIL-15	329	102	431	
SIL-16	151	37	188	
SIN-25	96	30	126	
SKE-22	92	50	142	
SKY-23	157	8	165	
SKY-25	111	21	132	
SLA-16	175	41	216	
SME-12	97	23	120	
SNQ-13	9	6	15	
SNQ-17	125	35	160	
SOO-25	136	35	171	
SUM-21	211	70	281	
SWD-13	98	40	138	
SWI-15	82	9	91	
TOL-15	206	60	266	
VAS-12	295	122	417	
VAS-13	318	123	441	
VAS-23	286	77	363	
WAY-15	45	28	73	
WIN-12	119	44	163	
WIN-13	108	51	159	
WIN-15	121	47	168	
WLS-16	176	37	213	
WOB-23	133	48	181	
WOL-23	46	6	52	
YEL-27	93	16	109	

3 letter code	Substation Name
AIR	AIRPORT
ALG	ALGER
AVO	AVONDALE
BCH	BIRCH BAY
BDI	BLACK DIAMOND
BEL	BELMORE
BIG	BIG ROCK
BLA	BLAINE
BLU	BLUMAER
BRS	BAKER RIVER SW
BRW	BURROWS BAY
CEK	CENTRAL KITSAP
CHA	CHAMBERS
CHI	CHICO
CHR	CHRISTENSENS CORNER
CLE	CLE ELUM
COT	COTTAGE BROOK
CTR	CHRISTOPHER
DGR	DIERINGER
DUV	DUVALL
ELD	ELD INLET
ETN	EASTON
EVE	EVERGREEN
FAL	FALL CITY
FCR	FOUR CORNERS
FLD	FREELAND
FNW	FERNWOOD
FRA	FRAGARIA
FRG	FRIENDLY GROVE
GAR	GARDELLA
GBK	GREENBANK
GOO	GOODES CORNER
GRI	GRIFFIN
GRV	GRAVELLY LAKE
GWR	GREENWATER
HAM	HAMILTON
HAP	HAPPY VALLEY
HKX	HICKOX
HOB	HOBART
HYA	HYAK
ING	INGLEWOOD
KEN	KENDALL
KIN	KINGSTON
KNM	KENMORE
KNO	KNOBLE
LEA	LEA HILL

3 letter code	Substation Name
LGY	LANGLEY
LLS	LAKE LOUISE
LLT	LAKE LEOTA
LMD	LAKE MERIDIAN
LOL	LONG LAKE
LON	LONGMIRE
LTA	LAKE TAPPS
LUH	LUHR BEACH
LWS	LAKE WILDERNESS
MAN	MANCHESTER
MCA	MCALLISTER SPRINGS
MIL	MILLER BAY
MKI	MCKINLEY
MOT	MOTTMAN
MVW	MARINE VIEW
NLM	NORLUM
NUG	NUGENTS CORNER
ORC	ORCHARD
ORT	ORTING
PAT	PATTERSON
PGA	PORT GAMBLE
PIK	PICKERING
PMA	PORT MADISON
POU	POULSBO
PRI	PRINE
PTR	POINT ROBERTS
RAI	RAINIER VIEW
SEM	SEMIAMMOO
SEQ	SEQUOIA
SHD	SHERWOOD
SHE	SHERIDAN
SIL	SILVERDALE
SIN	SINCLAIR INLET
SKE	SOUTH KEYPORT
SKY	SKYKOMISH
SLA	SLATER
SME	SOUTH MERCER
SNQ	SNOQUALMIE
SOO	SOOS CREEK
SUM	SUMMIT PARK
SWD	SERWOLD
SWI	SOUTHWICK
TOL	TOLT
VAS	VASHON
WAY	WAYNE
WIN	WINSLOW

3 letter code	Substation Name
WLS	WILSON
WOB	WOBURN
WOL	WEST OLYMPIA
YEL	YELM