

**Exhibit DTA-22**

*PSE Response to IBEW Data Request No. 028 with  
attachment (Electrical Contact Injuries to Non-PSE  
Employees)*

**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. 028**

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In reference to Request No. 06, please provide the number of electrical contact injuries to non-PSE employees (ex. other utility companies, state, county, and city employees, etc.) caused by PSE-owned equipment.

**Response:**

Each of the Joint Applicants object to IBEW Local 77 Data Request No. 028 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. 028 as not likely to lead to the discovery of evidence relevant to the possible harms associated with the Proposed Transactions, as overbroad and unduly burdensome because it requests information for the past ten years, and as vague and ambiguous as to the terms "electrical contact injuries" and "non-PSE employees."

Without waiving these objections and subject thereto, the table below lists, by year, the number of instances a non-Puget Sound Energy ("PSE") employee made contact with a PSE electrical facility, irrespective of whether there was an injury.

Note: PSE's systems and standards for tracking electrical contact by non-PSE employees have changed over time, which distorts the statistics provided below. For example, during the years 2014-2017, PSE did not track all instances of non-employee contact with PSE electrical facilities where there was no injury, whereas beginning in 2018, PSE has tracked all such contact, including where there was no injury.

Year	Number
2018	9
2017	0
2016	0
2015	1
2014	2
2013	5
2012	7
2011	6
2010	4