

Exhibit DTA-23
*PSE Response to IBEW Data Request No. 29 (24-Hour
Restoration Guarantee)*

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. 029

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Please provide the number of times in the past ten years that PSE has paid the \$50.00 owed for non-storm outages to customers.

Response:

Each of the Joint Applicants object to IBEW Local 77 Data Request No. 029 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. 029 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 phrase "non storm outages."

Without waiving these objections and subject thereto, Puget Sound Energy ("PSE") interprets the phrase "non-storm outages" to mean PSE's 24-Hour Restoration Service Guarantee under Schedule 131, which has been in effect since 2017. The table below contains a summary of the number of instances PSE has credited a customer \$50.00 under this guarantee.

Year	Number
2018 (through 6/2018) ¹	1
2017	250

¹ Data for the second half of 2018 is not yet available.