

Exhibit DTA-3
PSE Response to IBEW Data Request No. 004,
Attachment A (PSE Headcount from 2010 to 2018)

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. 004

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Please provide the annual staffing levels for all departments by classification since 2010.

Response:

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 004 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.

In particular, the WUTC in Prehearing Order 03, paragraph 22, identified topics that were outside of the Commission's review, such as what is requested in IBEW Local 77 Data Request No. 004:

As discussed above, employment issues such as workplace changes, labor contracts, wages, hours, and staffing are outside the Commission's purview.

Each of the Joint Applicants also objects to IBEW Local 77 Data Request No. 004 as overbroad because it exceeds the narrow scope of this proceeding and is not likely to lead to the discovery of evidence relevant to the possible harms associated with the proposed transactions. Given that discovery in this proceeding must be "narrowly defined and focused on the proposed transaction," (Docket U-180680, Order 01 at 8), information regarding annual staffing levels for all departments of Puget Sound Energy ("PSE") by classification since 2010 is not reasonably probative for consideration of the proposed transactions.

Each of the Joint Applicants further objects to IBEW Local 77 Data Request No. 004 as overbroad and unduly burdensome as it requests information for the past nine years.

Subject to and notwithstanding these objections, the Joint Applicants respond as follows.

Attached as Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 004 is an MS Excel spreadsheet that provides year-end headcount of employees of PSE represented by IBEW Local 77, totaled by group and position title.

**ATTACHMENT A to
the Joint Applicants' Response to
IBEW Local 77 Data Request No. 004**

Puget Sound Energy
Headcount of Employees Represented by IBEW As of Year-End for 2010 through 2017, YTD Oct for 2018
Total By Group and Position

<u>Group</u>	<u>Position</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	
IBEW A Group	Advanced Metering Specialist						1	1	1	1	
	App Hydro-E 5th 6mo	1									
	Appr CT 1st 6mo			1							
	Appr CT 2nd 6mo						1				
	Appr CT 3rd 6mo		2		1						
	Appr CT 4th 6mo							1			
	Appr CT 5th 6mo			2		1					
	Appr CT 6th 6mo	1							1		
	Appr CT 7th 6mo				2		1				
	Appr CT 8th 6mo	1	1							1	
	Appr Hydro E 6th 6mo		1								
	Appr Hydro E 7th 6mo		1								
	Appr Hydro E 8th 6mo			2							
	Appr Hydro M 6th 6mo		2								
	Appr Hydro M 7th 6mo		1								
	Appr Hydro M 8th 6mo			3							
	Appr Hydro-E 5th 6mo	1									
	Appr Hydro-M 4th 6mo	2									
	Appr Hydro-M 6th 6mo	1									
	Appr Mtrman 1st 6mo		2	2	1	1			3		
	Appr Mtrman 3rd 6mo	5		2	2	2	1	1			
	Appr Mtrman 5th 6mo		4		2	2	2	2	1		
	Appr Mtrman 6th 6mo							1	1		
	Appr Wireman						1				
	Appr Wireman 1st 6mo	6	3	4	3	4	4	4	1	4	5
	Appr Wireman 2nd 6mo		1					1	2		2
	Appr Wireman 3rd 6mo	2	5	3	4	3	4	4	5	1	2
	Appr Wireman 4th 6mo			2						3	
	Appr Wireman 5th 6mo	4	2	4	2	2	2	2	5	5	4
	Appr Wireman 6th 6mo							3	1		1
	Appr Wireman 7th 6mo	5	4	2	5	2			2	4	4
	Appr Wireman 8th 6mo	1								2	4
	Biological Technician I	1									
	Biological Technician III	6									
	Building Maint Foreman	1									
	Building Svcman Step 3	2									
	Building Svcman Step 4	2									
	Building Svcman Step 6	4									
	Comm Repairman	1	1	1	1	1	1	1	1		
	Comm Tech 1st 2 Yrs	6	5	7	3						
	Comm Tech 1st 2yrs							3	2	2	3
	Comm Tech After 2 Yr	4									
	Comm Tech After 2yrs		4	4	5	4		3	3		
	Comm Tech B		1						2	2	2
	Comm Tech Class B	1		1	1	1	1	1			
	Comm Tech Foreman	6	7	7	7	7	5	5	7	6	5
	Comm Tech Trainee 1st 6mo	2	1		1	1	1	1	1		
	Comm Tech Trainee 2nd 6mo		1	2						1	1
	Comm Tech Trainee 3rd 6mo				1	1				1	1
	Comm Tech Trainee 4th 6 mo		1								
	Comm Tech Trainee 4th 6mo				1	1					
	Crew Dispatcher	8	7	8	5	3		3	3	3	3
	CT Foreman							7	7	7	7
	CT Journey Worker	45	47	47	50	51		49	48	50	50
	CT Journey Worker (P)	1									
	CT Tech I	1	1								
	CT Tech II	1				1					
	CT Tech III	1	1	1							
	CT Tech IV	4	5	6	7	6					
	Cust Field Rep I	9	5								
	Cust Field Rep II	39	26	24	28	28		27	25	21	21
	Cust Svc Field Lead	4	4	4	4	4		3	3	3	3
	Drayage Driver							1	1	1	1
	Drayageman Trailer				1	1					
	Electric GIS Tech I							2			
	Environmental Coordinator	6	5	5	5	5		6	6	6	6
	EP Helper IV	1									
	EP Helper VI	2			1	1		1	1	1	1

EP Helper VII	9	2	2	1	1	1	1	1	1
EP Temp Worker 3rd 6m			1						
EP Temp Worker 3rd 6mo	1	1	1						2
Equipment Op Fleet	1	1	1						
Fish & Wildlife Specialist I			1				1		
Fish & Wildlife Specialist II		1		1				1	
Fish & Wildlife Specialist III		6	6	6	7	6	6	6	7
Headwks Attend-Flume Ptrl	1	1							
Hydro Electrician	8	8	6	7	7	6	6	6	5
Hydro Foreman						3	3	3	3
Hydro Mechanic	20	21	19	19	18	18	17	17	16
Hydro Mechanic (P)	1								
Hydro Operator	4	4	4	3	3	3	3	3	3
Hydro Tech				2					
Hydro Tech I					1				
Hydro Tech III	1				1				
Hydro Tech IV	2	3	2	2	1				
ICE Tech 4				1					
ICE Tech I	1	1	2	1			2		
ICE Tech II	1	1				1			
ICE Tech III							1	1	
ICE Tech IV	1		1	1	1			1	
ICE Tech V	2	3	3	3	4	5	5	6	8
Janitor 4th 6 Mo	3	3	3	2	2	2	2	2	2
Journeyman Meterman	17	16	19	19	20	17	15	14	16
Lead Meter Tech						1	1	1	1
Lead Relay Tech		1	1	1	1	1	1	1	1
Lead System Operator					6	6	6	6	6
Meter Foreman	4	4	4	4	4	4	4	4	5
Meter Tech	3	3	3	3	3	2	2	2	1
Meter Tech Trainee I						1			
Meter Tech Trainee II							1	2	1
Meter Tester I	2								
Meter Tester II	5	6	5	5	5	3	2	4	5
Meter/Relay Tech I	3								
Meter/Relay Tech IV	1								
Meter/Relay Tech V	8								
Meter-Trfmr Helper A 2 Yr	1	1	1	1	1	1	1	1	1
PTA/ Cust Field Rep I		1	2	2	17	6	20	13	6
PTA/ Cust Field Rep II		15	14	7	5	14	8	20	23
PTA/ EP Helper IV		1							
PTA/ EP Helper VI		1	1						
PTA/ EP Helper VII		2	2						
PTA/ Meter Tester							1		
PTA/ Meter Tester I			1		1	1	4	2	2
PTA/ Meter Tester II		1		1		1			1
PTA/ Wire Helper 1st 6mo				1					
PTA/ Wire Helper 2nd 6mo		1							
PTA/ Wire Helper 4th 6mo		1			2	5	5	1	2
PTA/ Wire Helper 5th 6mo			2	2	2				
PTA/ Wire Helper 6th 6mo			2	1	1			3	
PTA/ Wire Helper 7th 6mo							2		
PTA/ Wire Helper After 3yrs		1	1						
PTA/Meter Tester I			1						
Pwr Genrtn Svcnm III--M	1								
Pwr Genrtn Svcnm M III		1							
Relay Tech Trainee						1	1		
Relay Tech Trainee I		2	2		1		1		
Relay Tech Trainee II		2	2	2					
Relay Tech Trainee III			2	2	2				
Relay Tech Trainee IV				2	2				
Relay Technician		8	8	7	9	11	10	11	8
Relay Technician Trainee I						1		1	2
Relay Technician Trainee II							1	2	2
Relay Technician Trainee IV						2	1		
Relief Operator/Hydro Journeyman			2						
Service Lineman I	1								
Service Lineman II	1								
Shuffelton Shop & Yard Forer	1	1	1	1	1	1			
Shuffleton Equipment & Tool	1	1	1	1	1	1	1	1	1
Shuffleton Shop & Yard Foreman							1	1	1
Sr Comm Tech I	5	2	1	2	5	4	4	8	7
Sr Comm Tech II	8	10	11	11	10	12	11	11	13
Storekeeper	8	9	10	10	9	9	9	10	10

Temp Cust Svc Seasonal Wc 3
(blank) 1
Gas GIS Technician III
Gas GIS Technician II
Gas GIS Technician I
I-Assoc Business Technology Analyst

1
14
3
1

IBEW B Total	461	444	428	404	368	373	353	372	350
IBEW Grand Total	954	922	899	850	823	819	818	841	822