

Exhibit DTA-5
*PSE Response to IBEW Data Request No. 005,
Attachment A (PSE Employee Terminations 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. 005

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Please identify employee turnover and/or attrition by department and classification from 2010 to present.

Response:

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 005 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. 005:

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. 005 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 Puget Sound Energy ("PSE") employee turnover and/or attrition by department and classification from 2010 to present is not reasonably probative for consideration of the proposed transactions.

Each of the Joint Applicants further objects to IBEW Local 77 Data Request No. 005 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. 005 is an MS Excel spreadsheet that lists the counts of employees of PSE represented by IBEW Local 77 whose employment with PSE has terminated, sorted by group, cost center and position. Some of the employees included in the counts terminated from PSE after a period of time on paid Long-Term Disability and may have stopped actively working prior to January 1, 2010. They are included based on their separation date with PSE.

**ATTACHMENT A to the
Joint Applicants' Response to
IBEW Local 77 Data Request No. 005**

**Puget Sound Energy
Count of Employee Terminations From 2010 through YTD 2018
Employees Represented by IBEW sorted by Group, Cost Center and Position**

<u>Group</u>	<u>Cost Center</u>	<u>Cost Center Desc</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	1210	NTWRK & SEC INFRA	Comm Tech 1st 2yrs		1								
			Sr Comm Tech I		1								
	1215	Telecom Services	Comm Tech After 2yrs				1	1					
			Comm Tech Foreman				1		1	1			
			Sr Comm Tech					1					
			Sr Comm Tech I							1			
			Sr Comm Tech II										1
	1243	SCADA	Comm Tech Foreman										1
	1253	Transport Techs	Comm Repairman									1	
	1254	N&E Division Techs	Comm Tech										1
			Sr Comm Tech II									1	
	1265	Fac Maint & Services	Building Maint Foreman			1							
			Building Serviceman IV			4							
			Building Serviceman VI			2							
			Building Svcman Step 6		1	1							
			Janitor 4th 6 Mo					1					
		Facility ServMaintnt	Building Serviceman VI			1							
	1410	Dir. Comp & Benefits	Hydro Electrician/MP										1
			Meter Tester II/MP/LTD										1
			Supv Gas First Response/										1
			Svc Lineman II/MP/LTD										1
			Wire Helper After 3yrs/MP										1
	1416	HR Adv-Labor Rltn	Crew Dispatcher/MP/LTD						1				
			PTA/CFR II/MP/LTD						1				
			Service Lineman III/LTD							1			
			Sys Op V/LTD								1		
			Wireman/MP/LTD						1				
	3060	System Operators	Crew Dispatcher					1	2				
			Lead System Operator							1			
			Sys Op V		1								
			System Operator- Days		2			1	1				
			System Operator II					1					
			System Operator Trainee							1			
			System Operator Trainee -						1	1			
			System Operator V			1			3	1			
	3065	Sys Mqmt & Ops	Crew Dispatcher										1
			System Operator Trainee -									2	
			System Operator V									4	
	3090	Elct First Response	Svc Lineman			1		1			1		
			Svc Lineman I			1							
			Svc Lineman II		7	3	1	3	6	3	5	6	1
			Svc Lineman II/MP/LTD								1		
		Elect First Response	Svc Lineman II		1			1					
	3095	Gas First Response	Cust Field Rep II									1	
	3115	Meter Ntwrk Services	Cust Field Rep		1								
			Cust Field Rep I		1								
			Cust Field Rep II			2	1	2		1	2	2	3
		Cust Svc Field Lead		2					1		1		
		Meter Reader		1									
		PTA/ Cust Field Rep I				1		1	1	2	2		
		PTA/ Cust Field Rep II				1	1					1	
	Mtr Rdq & Collection	Cust Field Rep II		1									
3309	INACTIVE Field Meter	Appr Mtrman 3rd 6mo			1								
		Meter Foreman			1								
		Meter Tester I		1									
3372	INA-DO -N.Pen. Elec	Lineman				1							
4010	Dir Electric Op	Equipment Op Line		1									
		Svc Lineman II					1						
4050	Sub & Relay Ops	Relay Technician										3	
		Substation Inspector									1		
		Wire Helper After 3yrs										1	
		Wireman										1	
4056	Shuff. Wire Shop	Appr Wireman 3rd 6mo						1					
		Appr Wireman 4th 6mo						1					
		Wireman		2		1	2						
4057	Electric Meter Ops	Journeyman Meterman							1	3			
		Meter Foreman				1		1					
		Meter Tester II							1	1			
4058	Sub Relay Operations	Meter/Relay Tech V		1									
		Relay Technician					1				1		
4059	Elec Meter Mgr	Advanced Metering Special										1	
		Journeyman Meterman									1		
		Meter Foreman										2	
4060	Subs Noorth King	Substation Inspector						1	1	1			
		Wire Foreman				1							
		Wireman		1									
		Wireman Foreman			1								
4070	Subst South King	Appr Wireman 2nd 6mo		1									
		Substation Inspector			1		1						
		Wire Helper A 3 Yr		1									
		Wire Helper After 3yrs		1									
4080	Subst Northern	Substation Inspector		1				1	2				
		Wire Foreman				1	2	1					
		Wire Helper After 3yrs					1						
		Wireman				1							
4090	Subs Southern/Wester	Appr Wireman 3rd 6mo							1				

Group	Cost Center	Cost Center Desc	Position	2010	2011	2012	2013	2014	2015	2016	2017	2018
			Appr Wireman 5th 6mo					1				
			Appr Wireman 7th 6mo			1						
			Appr Wireman 8th 6mo		1							
			Substation Inspector						1			
			Wire Foreman	1	1	1						
			Wire Helper A 3 Yr	1								
	4300	Environmental Servcs	Environmental Coordinator		1				1		2	
	4560	Material Dist & Plnq Materials Management	Warehouser IV		1							
			Drayage Driver							1		
			Equipment Op Fleet	1			1					
			Storekeeper			1		1	1	1		1
			Transformerman						1			
			Warehouser II								1	
			Warehouser III					1	1			
			Warehouser IV								1	
	5009	Simple Cycle Plants	CT Journey Worker								1	2
	5017	Encogen	CT Journey Worker	1		1						
		Encogen Gen Plant	CT Journey Worker					1	2			1
			EP Helper VII		1							
			ICE Tech			1						
	5019	Sumas Gen Station	CT Journey Worker		1					1	1	1
	5021	Goldendale	CT Journey Worker	1								
		Goldendale Gen Stati	CT Foreman									1
			CT Journey Worker	1		1		1	2		1	
			ICE Tech V					1				
	5025	Mint Farm Gen Statn	CT Journey Worker		1						1	1
			CT Tech III		1							
			ICE Tech				1					
	5140	Fredonia Gen Plant	CT Foreman							1		
			CT Journey Worker							2		
	5150	Baker River Hydro Pj	Appr Hydro M 8th 6mo				1					
			Appr Hydro-E 8th 6mo	1								
			EP Temp Worker				1	1				
			EP Temp Worker 1st 6mo	1		1	3		1	3	4	3
			EP Temp Worker 2nd 6mo	2	1	1						2
			EP Temp Worker 3rd 6mo	1	1				1	1		3
			Fish & Wildlife Specialis			1						
			Hydro Electrician									1
			Hydro Mechanic	1								
			Hydro Operator		1							
		Lower Baker River	EP Helper VII				1					
			EP Temp Worker					1				
			EP Temp Worker 1st 6mo	3	4	1	1		1			
			EP Temp Worker 2nd 6mo	1	2			1	1			
			EP Temp Worker 3rd 6m				1					
			EP Temp Worker 3rd 6mo	2	2	3	6	2	1			
	5160	Upper Baker River	EP Temp Worker					1				
			EP Temp Worker 3rd 6mo					3	3			
		Upper Baker-Hydro Pj	EP Temp Worker					1				
			EP Temp Worker 1st 6mo						2	2		
			EP Temp Worker 3rd 6mo							4		
			Hydro Electrician	1								
			Hydro Operator	1								
	5170	Whitehorn Gen Statin	CT Journey Worker		1							
	5210	INACT- ELECTRON	EP Helper II	2	1							
			EP Helper III		1							
			EP Helper IV	8	9							
			EP Helper VII				1					
			Hydro Mechanic			1						
			Hydro Operator				1					
			PTA/ EP Helper VII				1					
			Pwr Genrtn Svcmn M III			1						
	5231	CLSD White River CWA	EP Temp Worker 1st 6mo	2								
			EP Temp Worker 2nd 6mo		1							
			EP Temp Worker 3rd 6mo			1						
			Headwks Attend-Flume Ptrl			1						
	5240	Sno River Hydro Pj	Hydro Electrician			1						
			Hydro Mechanic					1		1		1
			Hydro Tech I									
			Hydro Tech IV			1			1			
		Snoqualmie Hydro	EP Temp Worker 2nd 6mo	1								
			EP Temp Worker 3rd 6mo		1							
			Pwr Genrtn Svcmn I	1								
IB		System Operators	System Operator V				1					
			TOTAL IBEW A	62	56	30	41	42	39	37	38	35
IBEW B	1110	Assistant Treasury	Key Entry Operator									1
			Sr Cash Clerk								1	
	1410	Dir. Comp & Benefits	Cust Svc Rep I/MP/LTD								2	1
			Cust Svc Rep II/MP									1
			Cust Svc Rep II/MP/LTD								2	
			Customer Construction Rep									1
	1416	HR Adv-Labor Rltn	CFR/LTD					1				
			CSR I/LTD					1				
			CSR I/MP/LTD						1			
			CSR II/LTD						1			
			CSR II/MP/LTD					1	2			
			Eng Mapping Tech I/MP/LTD					1				
			Fitter III/LTD					1				

Group	Cost Center	Cost Center Desc	Position	2010	2011	2012	2013	2014	2015	2016	2017	2018
			LTD				2					
			Meter Reader/LTD					1				
	3010	Call Cntr Front Off	Cust Svc Clerk						2	3		1
			Cust Svc Rep I	15	14	8	11	19	25	28	35	27
			Cust Svc Rep I/MP								1	1
			Cust Svc Rep I/MP/LTD						1	1		
			Cust Svc Rep II	4	6	2	3	4	6	4	2	3
			Cust Svc Rep II/MP					1				
			Cust Svc Rep II/MP/LTD						3			
			Lead Cust Svc Rep			2	4	2	2	1		
			Temp CS Seasonal Worker	31	14	32	44	15	4			
			Temp Cust Svc Seasonal Wo	7	4	1						
		Customer Services	Cust Svc Clerk	1								
			Cust Svc Rep I	1	1	1			2			
			Cust Svc Rep II		2				1			
			Lead Cust Svc Rep		1	1	1					
			Temp CS Seasonal Worker	3	1	1	5	1				
			Temp Cust Svc Seasonal Wo	2	1							
	3011	Manager Credit&Collc	Closed Accts Collect Rep	1								
			Cust Svc Clerk	1	1			2			1	
			Cust Svc Rep I	3								
			Cust Svc Rep II									1
		Vendor Collection	Cust Svc Clerk		1							
	3012	Payment Processing	Key Entry Operator						1			
			Reconciliation Clerk							1		
	3014	Cus Billing Perf	Cust Svc Rep II									1
			Lead Corporate Billing Re									1
	3015	EES Lease Services	Cust Svc Rep I					1				
		Leasing Services	Cust Svc Rep I						1	1		2
			Cust Svc Rep II	2								
	3037	Gas Measurement	Cust Svc Rep I									1
	3090	Elct First Response	Ops Support Specialist	1		1		1				1
	3095	Gas First Response	Ops Support Specialist	1		1	1		1	1	1	1
	3115	Meter Ntwrk Services	Cust Svc Rep I	1	2	1	2	1	1	1		4
			Cust Svc Rep I/MP/LTD					1				
	3130	INACTIVE -Cashiering	Cust Svc Rep I	1								
	3180	Corporate Billing	Cust Svc Clerk		2	1						
			Cust Svc Rep II	2	2		3	3				
	3530	Cust Cnstrct Service	Cust Svc Rep I	1	2	3	1		2			2
			Customer Construction Rep	3			2	4	1	5	1	3
			Lead Cust Construction Re									1
			Sr Cust Construction Rep			3		1				
		Cust Constructn Svcs	Cust Svc Clerk			1						
			Cust Svc Rep I				1					
			Customer Construction Rep	1			1					
			Sr Cust Construction Rep						1			
	3610	Business Offices	Cust Svc Rep I			6	2	3	2	2		
			Cust Svc Rep I/MP							1		
			Cust Svc Rep I/MP/LTD						1			
			Cust Svc Rep II								1	
	4050	Sub & Relay Ops	Ops Support Specialist			1						1
	4230	Map, Rec Del & Tech	Electric GIS Tech I									1
			Electric GIS Tech II								1	
			Engineering Mapping Tech	4		1			1			
			Gas GIS Tech II								1	1
			Gas GIS Technician I							1		4
			Gas GIS Technician II							2		
			Operating Clerk	1								
			Ops Support Specialist		1	1				1		
	4465	Energy Asst Dept.	Cust Svc Clerk	1								
			Cust Svc Rep I	1	1							
	4560	Materials Management	Ops Support Specialist					1				
	4580	Engineering	Engineering Planner 3			1						
	5021	Goldendale Gen Stati	Ops Support Specialist					1				
	5150	Baker River Hydro Pj	EP Temp Worker 1st 6mo									2
			EP Temp Worker 2nd 6mo								1	
			EP Temp Worker 3rd 6mo								5	1
			Ops Support Specialist		1							
	5240	Sno River Hydro Pj	Ops Support Specialist			1						
			TOTAL IBEW B	89	57	70	83	67	62	54	54	64
			Grand TOTAL	151	113	100	124	109	101	91	92	99