

Exhibit DTA-6
PSE Response to IBEW Data Request No. 014

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. 014

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Please identify the Wire Guard Team (damage assessors) and their job classifications, also noting if they have any specialized training, and if they are designated a "high voltage qualified electrical worker."

Response:

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 014 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 the Wire Guard Team and their job classifications and training are not reasonably probative for consideration of the proposed transactions. Subject to and notwithstanding these objections the Joint Applicants respond as follows.

A member of a Wire Guard Team is a separate storm role than a Damage Assessor and receives different annual training. Attached as Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 014 is an MS Excel spreadsheet that provides a list of current employees who are trained to perform Wire Guard and Damage Assessor duties, respectively, during a storm along with a summary of their respective annual training. Since departments and job titles routinely change, the data includes whether the employee is Exempt, Non-Exempt, or IBEW represented. Please note that employee names are not included in Attachment A to the Joint Applicants' Response to IBEW Local 77 Data Request No. 014.

Members of the Wire Guard Team and Damage Assessors are not designated a "High Voltage Qualified Electrical Worker" as defined by the Washington Administrative Code (WAC) and are each trained to maintain a distance of thirty feet or greater from any downed power lines. Please note that some Journey Level Qualified Electrical Workers represented by IBEW Local 77 perform the Damage Assessor role during a storm and may be designated as a "Qualified Electrical Worker," and classifications represented by IBEW Local 77 may work as members of a Wire Guard Team. Damage Assessor training is conducted by Operational Training and includes training from Journey-level Servicemen.

**ATTACHMENT A to the
Joint Applicants' Response to
IBEW Local 77 Data Request No. 014**

Last Name	First name	Employee Group
Employee	1	IBEW A Group
Employee	2	Exempt
Employee	3	Exempt
Employee	4	Exempt
Employee	5	IBEW A Group
Employee	6	Exempt
Employee	7	Exempt
Employee	8	IBEW A Group
Employee	9	IBEW A Group
Employee	10	IBEW A Group
Employee	11	Exempt
Employee	12	IBEW A Group
Employee	13	IBEW A Group
Employee	14	Exempt
Employee	15	UA Local 26
Employee	16	Exempt
Employee	17	IBEW A Group
Employee	18	IBEW A Group
Employee	19	Exempt
Employee	20	IBEW A Group
Employee	21	Exempt
Employee	22	Exempt
Employee	23	IBEW A Group
Employee	24	IBEW A Group
Employee	25	IBEW A Group
Employee	26	Exempt
Employee	27	IBEW A Group
Employee	28	Exempt
Employee	29	Exempt
Employee	30	IBEW A Group
Employee	31	Exempt
Employee	32	Exempt
Employee	33	Exempt
Employee	34	Exempt
Employee	35	IBEW A Group
Employee	36	IBEW A Group
Employee	37	IBEW A Group
Employee	38	Exempt
Employee	39	Exempt
Employee	40	IBEW A Group
Employee	41	Exempt
Employee	42	IBEW A Group
Employee	43	Exempt
Employee	44	IBEW A Group
Employee	45	Exempt
Employee	46	Exempt

Employee	47	IBEW A Group
Employee	48	Exempt
Employee	49	IBEW A Group
Employee	50	Exempt
Employee	51	Exempt
Employee	52	Exempt
Employee	53	Exempt
Employee	54	IBEW A Group
Employee	55	Exempt
Employee	56	Exempt
Employee	57	Exempt
Employee	58	Exempt
Employee	59	IBEW A Group
Employee	60	IBEW A Group
Employee	61	Exempt
Employee	62	Exempt
Employee	63	Exempt
Employee	64	IBEW A Group
Employee	65	Exempt
Employee	66	Exempt
Employee	67	Exempt
Employee	68	Exempt
Employee	69	Exempt
Employee	70	Exempt
Employee	71	Exempt
Employee	72	Exempt
Employee	73	Exempt
Employee	74	Exempt
Employee	75	Exempt
Employee	76	Exempt
Employee	77	IBEW A Group
Employee	78	IBEW A Group
Employee	79	IBEW A Group
Employee	80	IBEW A Group
Employee	81	Exempt
Employee	82	Exempt
Employee	83	IBEW A Group
Employee	84	Exempt
Employee	85	Exempt
Employee	86	Exempt
Employee	87	IBEW A Group
Employee	88	IBEW A Group
Employee	89	Exempt
Employee	90	Exempt
Employee	91	Exempt
Employee	92	IBEW A Group
Employee	93	Exempt

Employee	94	Exempt
Employee	95	Exempt
Employee	96	IBEW A Group
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Employee	99	IBEW A Group
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Employee	101	Exempt
Employee	102	IBEW A Group
Employee	103	Exempt
Employee	104	Exempt
Employee	105	Exempt
Employee	106	Exempt
Employee	107	Exempt
Employee	108	Exempt
Employee	109	IBEW A Group
Employee	110	Exempt
Employee	111	Exempt
Employee	112	IBEW A Group
Employee	113	Exempt
Employee	114	Exempt
Employee	115	Exempt
Employee	116	IBEW A Group
Employee	117	IBEW A Group
Employee	118	Exempt
Employee	119	Exempt
Employee	120	Exempt
Employee	121	Exempt
Employee	122	IBEW A Group
Employee	123	Exempt
Employee	124	Exempt
Employee	125	Exempt
Employee	126	IBEW A Group
Employee	127	Exempt
Employee	128	Exempt
Employee	129	IBEW A Group
Employee	130	Exempt
Employee	131	IBEW A Group
Employee	132	IBEW A Group
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Employee	141	IBEW A Group
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Employee	147	IBEW A Group
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Employee	149	Exempt
Employee	150	IBEW A Group
Employee	151	Exempt
Employee	152	IBEW A Group
Employee	153	IBEW A Group
Employee	154	IBEW A Group
Employee	155	Exempt
Employee	156	Exempt
Employee	157	Exempt
Employee	158	Exempt
Employee	159	IBEW A Group
Employee	160	Exempt
Employee	161	IBEW A Group
Employee	162	Exempt
Employee	163	IBEW A Group
Employee	164	Exempt
Employee	165	Exempt
Employee	166	IBEW A Group
Employee	167	Exempt
Employee	168	IBEW A Group
Employee	169	Exempt
Employee	170	IBEW A Group
Employee	171	Exempt
Employee	172	Exempt
Employee	173	IBEW A Group
Employee	174	Exempt
Employee	175	IBEW A Group
Employee	176	Exempt
Employee	177	IBEW A Group
Employee	178	Exempt
Employee	179	IBEW A Group
Employee	180	Exempt
Employee	181	Exempt
Employee	182	IBEW A Group
Employee	183	IBEW A Group
Employee	184	Exempt
Employee	185	Exempt
Employee	186	Exempt
Employee	187	IBEW A Group

Employee	188	Exempt
Employee	189	Exempt
Employee	190	IBEW A Group
Employee	191	Exempt
Employee	192	Exempt
Employee	193	IBEW A Group
Employee	194	Exempt
Employee	195	Exempt
Employee	196	Exempt
Employee	197	Exempt
Employee	198	IBEW A Group
Employee	199	Exempt
Employee	200	Exempt
Employee	201	IBEW A Group
Employee	202	IBEW A Group
Employee	203	Exempt
Employee	204	IBEW A Group
Employee	205	Exempt
Employee	206	Non-Exempt
Employee	207	IBEW A Group
Employee	208	Exempt
Employee	209	IBEW A Group
Employee	210	Exempt

Last Name	First name	Employee Group
Employee	1	IBEW A Group
Employee	2	IBEW A Group
Employee	3	Exempt
Employee	4	IBEW A Group
Employee	5	IBEW A Group
Employee	6	IBEW A Group
Employee	7	IBEW A Group
Employee	8	IBEW A Group
Employee	9	IBEW A Group
Employee	10	IBEW A Group
Employee	11	Exempt
Employee	12	IBEW A Group
Employee	13	IBEW A Group
Employee	14	Exempt
Employee	15	IBEW A Group
Employee	16	IBEW A Group
Employee	17	IBEW A Group
Employee	18	IBEW A Group
Employee	19	IBEW A Group
Employee	20	Exempt
Employee	21	IBEW A Group
Employee	22	IBEW A Group
Employee	23	IBEW A Group
Employee	24	IBEW A Group
Employee	25	Exempt
Employee	26	IBEW A Group
Employee	27	IBEW A Group
Employee	28	Exempt
Employee	29	IBEW A Group
Employee	30	IBEW A Group
Employee	31	IBEW A Group
Employee	32	IBEW A Group
Employee	33	IBEW A Group
Employee	34	Non-Exempt
Employee	35	IBEW A Group
Employee	36	IBEW A Group
Employee	37	IBEW A Group
Employee	38	IBEW A Group
Employee	39	IBEW A Group
Employee	40	IBEW A Group
Employee	41	IBEW A Group
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Employee	43	IBEW A Group
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Employee	45	IBEW A Group
Employee	46	IBEW A Group

Last Name	First name	Employee Group
Employee	47	IBEW A Group
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Employee	53	IBEW A Group
Employee	54	IBEW A Group
Employee	55	IBEW A Group
Employee	56	IBEW A Group
Employee	57	IBEW A Group
Employee	58	IBEW A Group
Employee	59	Exempt
Employee	60	IBEW A Group
Employee	61	Exempt
Employee	62	IBEW A Group
Employee	63	IBEW A Group
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Employee	66	IBEW A Group
Employee	67	IBEW A Group
Employee	68	IBEW A Group
Employee	69	IBEW A Group
Employee	70	IBEW A Group
Employee	71	IBEW A Group

Damage Assessors receive annual training and/or are assessed on overhead line, pole, and devices.

Damage Assessors receive annual training on field safety.

Damage Assessors understand the required PPE expectations, and employees can order that PPE from the MatCat.

Annually, Damage Assessors electronically acknowledge the Field Safety Code.

Operational Training provides a list of employees who have completed training/certification to Mary Hobday, who maintains the Master Call Out List.

Damage Assessor Field Safety Code

1. Stay in vehicle whenever possible
 - a. Use common sense
 - b. If the car will not make it up a hill
 - c. Debris in the roadway
2. Drive only on paved/graveled roadways/driveways
3. Do not exit vehicle without wearing the following Personal Protective Equipment:
 - a. Hard hat with adhesive reflectors
 - b. Safety glasses
 - c. Sturdy footwear/boots
 - i. During icy conditions, use traction footwear (Yaktrax) available from PSE Stores
 - d. PSE reflective vest during daylight hours, or full body reflective gear (PSE vest or jacket, and pants) outside daylight hours
4. Once you have located the damage:
 - a. Write name, phone number, date, and time on pink damage tag
 - b. Secure tag at a safe location near the pole
 - c. Not on damaged equipment
 - d. Not on a pole with damaged equipment
 - e. Not anywhere within 30 feet of fallen or downed electrical equipment or wire
 - f. Place tag on an adjacent pole or the nearest switch pole with a reference to the actual damage location
5. Maintain at least a 30 foot distance from conductors and any other electrical equipment
 - a. Never touch any wire, even if you are certain it is comms/fiber optic wire
6. Walk only on paved/graveled roadways/driveways or sidewalks
 - a. Do not walk into wooded areas
 - b. Unless you are following an obvious, cleared pathway or trail
 - c. If you have to clear or navigate brush, do not continue
 - d. Do not touch metal fences or structures with any part of your body
 - e. Do not climb over, under, or through fallen material