

**Exhibit DTA-7**  
*PSE Response to IBEW Data Request No. 022*

**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. 022**

**IBEW LOCAL 77 DATA REQUEST NO. 022**

Please provide the total number of hours worked by each serviceman, substation inspector, meterman, and call center employees by cost center over the last ten years.

**Response:**

Each of the Joint Applicants object to IBEW Local 77 Data Request No. 022 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. 022:

[E]mployment issues such as workplace changes, labor contracts, wages, hours, and staffing are outside the Commission's purview.

Each of the Joint Applicants also object to IBEW Local 77 Data Request No. 022 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 because "serviceman," "meterman," and "call center employees by cost center," are generic terms that do not align with actual Puget Sound Energy ("PSE") job titles.

Without waiving these objections and subject thereto, because it is unclear which jobs IBEW is referring to exactly, Attachment A to the Joint Applicants' Response to IBEW

Joint Applicants' Response to IBEW Local 77 Data Request No. 022

Page 1

Date of Response: January 31, 2019

Person who Prepared the Response: Thomas M. Hunt

Witness Knowledgeable About the Response: Joel Molander

Local 77's Data Request No. 022 contains total hours paid from PSE payroll extracts for 2013 through 2018 for all PSE employees represented by the IBEW who worked any hours in 2018. Total hours paid include all types of regular hours and overtime hours, but excludes paid time off, holidays, personal holidays, and paid or unpaid leaves of absence. One row on the attachment represents one person.

Cost center and job title are based on the employee's work location and job title as of year-end 2018. Prior years data for the employee might have been in a different PSE job title or location. Values of 0 hours worked prior to 2018 means the time period is prior to when the employee began work at PSE.