

Exhibit DTA-9
*PSE Response to IBEW Data Request No. 012,
Attachment A (PSE Motor Vehicle Incidents 2013 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. 012

IBEW LOCAL 77 DATA REQUEST NO. 012

Please identify all accidents, vehicle accidents, and/or safety incidents by category from 2010 to present.

Response:

Each of the Joint Applicants objects to IBEW Local 77 Data Request No. 012 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 all accidents, vehicle accidents, and/or safety incidents of Puget Sound Energy ("PSE") from 2010 to present is not reasonably probative for consideration of the proposed transactions.

Each of the Joint Applicants also objects to IBEW Local 77 Data Request No. 012 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 the IBEW Local 77 Data Request No. 012 is a summary of motor vehicle accidents from 2013 to present for PSE. Please note that PSE did not categorize vehicle accidents prior to 2013.

Attached as Attachment B to the Joint Applicants' Response to the IBEW Local 77 Data Request No. 012 are annual summaries of OSHA recordable safety incidents for PSE by category from 2010 to present.

**ATTACHMENT A to the
Joint Applicants' Response to
IBEW Local 77 Data Request No. 012**

PSE Corporate Totals Motor Vehicle Incidents As of 12/28/2018						
	2013	2014	2015	2016	2017	2018 YTD
Total Vehicle Accidents	107	97	110	103	104	93
PSE at Fault (Preventable)	60	48	52	51	49	47
3rd Party at Fault (Non-Preventable)	47	49	58	52	55	46
Total Infractions (Photo & Ticket)	37	22	24	18	34	32