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ATTORNEY GENERAL OF WASHINGTON

900 Fourth Avenue #2000 • Seattle WA 98164-1012

April 19, 2006

VIA FAX AND FIRST CLASS MAIL

Carole Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re:

WUTC v. PSE, Inc.

Docket Nos. UE-060266/UG-060267

Dear Ms. Washburn:

Enclosed please find the originals and sixteen copies each of the protective order agreements for confidential and highly confidential information of Steven C. Carver, Michael L. Brosch, James R. Dittmer, and Debora L. Clark for filing in the above-entitled dockets.

Sincerely,

Simon J. ffitch

Assistant Attorney General Public Counsel Section

(206) 389-2055

SJf:kez Enclosures

cc: Service List (U.S. Mail)

PACE 15-D

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EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION
IN DOCKET UE-060266 and UG-060267
BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, Steven C. CARVER	, as
In-house attorney In-house expert Outside counsel Outside expert	
this proceeding for AG Public County	(a party to f

in this proceeding for AC Public Counce (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of energy resources; and
- I am not now involved, and will not for a period of two years involve myself in, the ownership or development of electric energy projects or resources:
 (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio; and
- c. I am not now involved, and will not for a period of two years involve myself in, providing consulting services or advice to owners or developers of electric energy projects or resources: (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio, to the extent such consultation or advice involves matters for which the "highly confidential" information would be relevant; and

d. I have read and understand, and agree to Protective Order in this proceeding, income	
Order.	OTIL: AND TRANSE. CONMISSION
$1-\infty$	VOLITION VIIV
# (los	4-12-06
Signature	Date
Lee's Summit MO	
City/State where this Agreement was signed	
Utilitech Inc Employer	
Employer /	
Vice President	740 NW Blue Purtwy Ste 204
Position and Responsibilities	740 NW Blue Purtwy Ste 204 Permanent Address Lee's Summit N
* * *	
The following portion is to be completed by th	e responding party and filed with the
Commission within 10 days of receipt. Failure	
the above-named person will be deemed a pers	• •
Confidential Information under the terms and o	conditions of the protective order.
No objection.	
Objection. The responding pa	rty objects to the above-named person
having access to Highly Confidential Informati	ion. The objecting party shall file a
motion with the Commission, supported by aff	
objection and asking exclusion of the person fr	om access to Highly Confidential
Information.	
	D. /
Signature	Date

06 APR 20 AM 8: 50 EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)

AGREEMENT CONCERNING HIGHLY CONFEDENTIAL INFORMATION

MORE MENT CONCERNING INGILL CONFIDENTIAL INFORMATION
IN DOCKET UE-060266 and UG-060267
BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
I, Michael C Brosch, as
In-house attorney
In-house expert
Outside counsel
🔀 Outside expert
in this proceeding for AC Public Course (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of
Washington that the following are true and correct:

- I am not now involved, and will not for a period of two years involve myself a. in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of energy resources; and
- b. I am not now involved, and will not for a period of two years involve myself in, the ownership or development of electric energy projects or resources: (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio; and
- I am not now involved, and will not for a period of two years involve myself c. in, providing consulting services or advice to owners or developers of electric energy projects or resources: (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio, to the extent such consultation or advice involves matters for which the "highly confidential" information would be relevant; and

d.	I have read and understand, and agree to Protective Order in this proceeding, inc. Order.	o be bound by, the terms of the Protective ASI. UTIL. AND TRANSP. COMMISSION
Signa	ture The state of	<u>4-12-06</u> Date
City/S	State where this Agreement was signed	
Ut Emple	oyer Inc	
Positi	on and Responsibilities	740 NW Blue Purkwy Ste 204 Permanent Address Leas Summit M
Comn the ab	ollowing portion is to be completed by the nission within 10 days of receipt. Failure ove-named person will be deemed a persodential Information under the terms and c	to do so will constitute a waiver and on having access to Highly
	No objection.	
motion object	Objection. The responding paragraph of access to Highly Confidential Information with the Commission, supported by affition and asking exclusion of the person from the person	davit, setting forth the basis for
 Signat	ture	Date

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EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)

AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION IN DOCKET UE-060266 and UG-060267

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

I, James R Diffmer	, as
In-house attorney In-house expert Outside counsel X Outside expert	
this managed in a Co. AC. O. I.I. C.	

in this proceeding for AC Public Counsel (a party to this proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- a. I am not now involved, and will not for a period of two years involve myself in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of energy resources; and
- I am not now involved, and will not for a period of two years involve myself in, the ownership or development of electric energy projects or resources:
 (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio; and
- c. I am not now involved, and will not for a period of two years involve myself in, providing consulting services or advice to owners or developers of electric energy projects or resources: (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio, to the extent such consultation or advice involves matters for which the "highly confidential" information would be relevant; and

d.

Protective Order in this proceeding, inclu Order.	ading this Section C of the Protective
Signature Dithrey	<u>4-12-06</u> Date
Lee's Summit MO City/State where this Agreement was signed	
Utilitech Inc Employer	
Senior Regulatory Consultant Position and Responsibilities	740 NW Blue Purkwy Ste 204 Permanent Address Leas Summit, MO
* * * The following portion is to be completed by the Commission within 10 days of receipt. Failure t the above-named person will be deemed a person Confidential Information under the terms and confidential Information under the terms are the confidential Information under the confidential Information	o do so will constitute a waiver and having access to Highly
No objection.	
Objection. The responding part having access to Highly Confidential Information motion with the Commission, supported by affid objection and asking exclusion of the person from Information.	avit, setting forth the basis for
Signature	Date

I have read and understand, and agree to be bound by, the terms of the

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EXHIBIT C (HIGHLY CONFIDENTIAL INFORMATION AGREEMENT)

UTIL. AND TR. AGREEMENT CONCERNING HIGHLY CONFIDENTIAL INFORMATION IN DOCKET UE-060266 and UG-060267

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION	N COMMISSION
I, Debora L. Clark	, as
In-house attorney In-house expert	
Outside counsel Outside expert	
this proceeding for AC Public Councel	(0 months to this
Occeding hereby declare under nonalty of narrians and a start at	(a party to this

in proceeding) hereby declare under penalty of perjury under the laws of the State of Washington that the following are true and correct:

- I am not now involved, and will not for a period of two years involve myself a. in, competitive decision making with respect to which the documents or information may be relevant, by or on behalf of any company or business organization that competes, or potentially competes, with the company or business organization from whom they seek disclosure of highly confidential information with respect to the development or purchase of energy resources; and
- b. I am not now involved, and will not for a period of two years involve myself in, the ownership or development of electric energy projects or resources: (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio; and
- I am not now involved, and will not for a period of two years involve myself c. in, providing consulting services or advice to owners or developers of electric energy projects or resources: (i) that have been or could potentially be offered to PSE for its electric portfolio; or (ii) that are competing or could potentially compete with other projects that are or could be offered to PSE for its electric portfolio, to the extent such consultation or advice involves matters for which the "highly confidential" information would be relevant; and

d.

Protective Order in this proceeding, incl Order.	uding this Section C of the Protective
Debora L. Clark	4-12-06
Signature	Date
Lee's Summit MO	
City/State where this Agreement was signed	
Utilitech Inc Employer	
Employer '	
Utility Analyst	740 NW Blue Purkwy Ste 204 Permanent Address Leas Summit M
Position and Responsibilities	Permanent Address Leas Summit, 10
* * *	
The following portion is to be completed by the	
Commission within 10 days of receipt. Failure the above-named person will be deemed a person	
Confidential Information under the terms and co	<u> </u>
	marions of the protoctive order.
No objection.	
	ty objects to the above-named person
having access to Highly Confidential Informatio	·
motion with the Commission, supported by affic	•
objection and asking exclusion of the person from	m access to Highly Conndential

Signature	Date

I have read and understand, and agree to be bound by, the terms of the