

**Exhibit No. ECO-12  
Dockets UE-151871/UG-151872  
Witness: Elizabeth C. O'Connell**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**DOCKETS UE-151871/UG-151872  
(consolidated)**

**EXHIBIT TO  
TESTIMONY OF**

**ELIZABETH C. O'CONNELL**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PSE response to Staff Data Request 72*

**June 7, 2016**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-151871 UG-151872  
Puget Sound Energy's  
Electric and Natural Gas Equipment Lease Service**

**WUTC STAFF DATA REQUEST NO. 072**

**WUTC STAFF DATA REQUEST NO. 072:**

Regarding maintenance costs and frequency, please provide:

- a. The method used to calculate maintenance frequency for each appliance (equipment) included in Schedule 75.
- b. Please provide in Excel format, with calculations and formulas intact, all values used to calculate service frequency for each appliance (equipment) included in Schedule 75.

**Response:**

Puget Sound Energy ("PSE") objects to WUTC Staff Data Request No. 072 as unduly burdensome because it seeks information already in the possession of, obtainable by, or otherwise available to WUTC Staff. Without waiving such objections, and subject thereto, PSE responds as follows:

- a. PSE developed the frequency of maintenance for each appliance in collaboration with internal and external subject matter experts, including PSE Gas First Response and PSE Energy Efficiency staff, as well as HVAC equipment distribution and installation service partners.
- b. The frequency of maintenance for each appliance included in Schedule 75 can be found in cell K13 on tabs titled "32(HC)", "33(HC)", "34(HC)", "35(HC)", "36(HC)", "38(HC)", "39(HC)", "40(HC)", "41(HC)", "42(HC)", "44(HC)", and "45(HC)" of the highly confidential lease pricing worksheet that PSE provided on February 19, 2016.