

**Exhibit No. EH-16**  
**Docket U-180680**  
**Witness: Erin Hutson**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. U-180680

TESTIMONY OF

**ERIN HUTSON**

LABORERS INTERNATIONAL UNION OF AMERICA

**Exhibit EH-16**

February 8, 2019

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket U-180680  
Puget Sound Energy  
Sale of Non-Controlling Interest in Puget Holdings LLC**

**WNIDCL DATA REQUEST NO. 003:**

Please indicate whether any contractor has ever had its relationship with PSE discontinued as a result of the Responsible Supplier and Contractor Guidelines and provide any documents related to such discontinuance if so.

**Response:**

Puget Sound Energy (“PSE”) objects to WNIDCL Data Request No. 003 as beyond the scope of WNIDCL’s participation in this matter as provided by the WUTC in Prehearing Order 03, paragraph 17, which limits WNIDCL’s participation as follows:

WNIDCL 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. We expressly decline to consider any labor relations matters in this proceeding covered by the collective bargaining agreement. In the event it becomes clear later in the proceeding that WNIDCL’s continued participation is not in the public interest, the Commission has the authority to dismiss WNIDCL as an intervenor.

PSE also objects to WNIDCL Data Request No. 003 as not reasonably calculated to lead to the discovery of admissible evidence as it seeks information that is irrelevant and beyond the scope of this proceeding.

Without waiving these objections and subject thereto, while the Responsible Supplier and Contractor Guidelines are a key input to PSE’s procurement of all goods and services, individual contractor performance metrics are established in direct connection with the specific work being performed (e.g., scope, schedule, budget, quality, safety, compliance, etc.) and are relied upon for discontinuance where necessary. As such, discontinuance of service is based on contract-specific performance and not directly attributable to the Responsible Supplier and Contractor Guidelines.