

**Exhibit No. EH-10**  
**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-10**

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. 009:**

Provide the last five most recent contract awards for the provision of traffic control services, including the Request for Proposal, technical evaluations used to qualify contractors, bid amounts and actual costs of the awarded contract, and any evaluations of the performance of the winning bidder.

**Response:**

Puget Sound Energy (“PSE”) objects to WNIDCL Data Request No. 009 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. 009 as overbroad and unduly burdensome and 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, Traffic Control (“TC”) projects typically have estimated values that are significantly lower than the threshold for which PSE requires a project be taken out to bid; therefore, there are no recently awarded Request for Proposals for this type of work. Any PSE department or personnel requesting TC services has the option to use the vendor of their choice (per available, active TC companies on file). Rates per each vendor are available for cost/value comparison.

TC vendors brought on board since 2016 were subject to Safety (Occupational Safety and Health Administration & Experience Modification Rate reviews) via the PSE Safety

Department and Insurance & Risk Certificate of Insurance reviews. The active TC vendors currently on file are:

- Traffic Management, Inc.
- Advanced Government Services
- Labor/People Ready
- Northwest Safety Signs
- K&D Services
- AA Asphaltting
- Altus Traffic Management
- Traffic Control Services, Inc.