

**EXHIBIT NO. \_\_\_(GZ-7)  
DOCKET NO. UE-051828/UE-051966  
WITNESS: GREG ZELLER**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WESTERN VILLAGE, LLC, D/B/A  
WESTERN VILLAGE ESTATES,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY, INC.**

**Respondent.**

**Docket No. UE-051828**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY, INC.,**

**Respondent.**

**Docket No. UE-051966**

**SECOND EXHIBIT TO THE PREFILED TESTIMONY OF  
GREG ZELLER, P.E.  
ON BEHALF OF PUGET SOUND ENERGY, INC.  
IN RESPONSE TO THE  
PREFILED TESTIMONY OF WESTERN VILLAGE, LLC  
DATED MARCH 8, 2006**

**APRIL 19, 2006**

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-051828 & UE-051966**

**Puget Sound Energy, Inc.'s Proposed Revisions to Electric Schedules 80 and 85  
and**

**Formal complaint by Western Village, LLC against Puget Sound Energy**

**PSE REQUEST NO. 004 to WESTERN VILLAGE ESTATES**

**Request:**

Please describe all electric facility installations, maintenance or repairs made at Western Village Estates from the date of initial construction of the mobile home park to the present date, including what was done, by whom, on what date, who arranged for and authorized the work, and who paid for the work.

**Response:**

Western Village objects to this data request insofar as it is overbroad and outside the scope of discovery, and requires information which is as easily accessible to PSE as it is Western Village. Without waiving this objection, each document is presently in the possession of PSE.

Any problems which have arisen over the years were reported to Puget Power/Puget Sound Energy and were repaired by Puget Power/Puget Sound Energy or their contractors. All such work was paid for by Puget Power/Puget Sound Energy.

All installation and maintenance of from the primary and secondary electrical distribution systems through to the meters at each individual home have been the property and responsibility of Puget Power / Puget Sound Energy from their initial installation to present.

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-051828 & UE-051966**

**Puget Sound Energy, Inc.'s Proposed Revisions to Electric Schedules 80 and 85  
and**

**Formal complaint by Western Village, LLC against Puget Sound Energy**

**PSE REQUEST NO. 007 to WESTERN VILLAGE ESTATES**

**Request:**

**(Re: Declaration of Doug Anderson at ¶ 8)**

A. Please provide a description of all electrical service installation, repair and maintenance by PSE that is referenced in the following statement, as well as all documents related to such work:

"PSE's electrical service facilities at each resident's lot connects to service facilities which were installed by PSE or its predecessors, and which have been maintained and replaced by PSE at all times relevant to this matter." (Declaration of Doug Anderson at ¶ 8).

B. Please provide a description of and all documents related to any other electrical work performed at Western Village Estates.

**Response:**

Western Village objects to this data request insofar as it is overbroad and outside the scope of discovery, and requires information which is as easily accessible to PSE as it is Western Village. Without waiving this objection, each document is presently in the possession of PSE.

Since the electrical service installation, repair and maintenance of Puget Powers/Puget Sound Energy's system is the property and responsibility of Puget Sound Energy, we have no specific dates or records regarding the maintenance or upgrades of the electrical distribution system. At all times when there has been a maintenance or service issue with the primary lines or secondary lines leading to and including the meter, Puget Power/Puget Sound Energy has responded and repaired the problem.

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-051828 & UE-051966**

**Puget Sound Energy, Inc.'s Proposed Revisions to Electric Schedules 80 and 85  
and**

**Formal complaint by Western Village, LLC against Puget Sound Energy**

**PSE REQUEST NO. 008 to WESTERN VILLAGE ESTATES**

**Request:**

**(Re: Declaration of Doug Anderson at ¶ 9)**

Please provide a description of and all documentation related to all repair, maintenance, and replacement of electrical facilities at each resident's lot as referred to in the Declaration of Doug Anderson at ¶ 9.

**Response:**

Western Village objects to this data request insofar as it is overbroad and outside the scope of discovery, and requires information which is as easily accessible to PSE as it is Western Village. Without waiving this objection, each document is presently in the possession of PSE.

Since the electrical service installation, repair and maintenance of Puget Powers/Puget Sound Energy's system is the property and responsibility of Puget Sound Energy, we have no specific dates or records regarding the maintenance or upgrades of the electrical distribution system. At all times when there has been a maintenance or service issue with the primary lines or secondary lines leading to and including the meter, Puget Power/Puget Sound Energy has responded and repaired the problem.

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket Nos. UE-051828 & UE-051966**

**Puget Sound Energy, Inc.'s Proposed Revisions to Electric Schedules 80 and 85  
and**

**Formal complaint by Western Village, LLC against Puget Sound Energy**

**PSE REQUEST NO. 009 to WESTERN VILLAGE ESTATES**

**Request:**

**(Re: Declaration of Doug Anderson at ¶ 9)**

Please provide a description of and all documentation related to all repair maintenance, and replacement of electrical facilities at PSE's transformers as referred to in the Declaration of Doug Anderson at ¶ 9.

**Response:**

Western Village objects to this data request insofar as it is overbroad and outside the scope of discovery, and requires information which is as easily accessible to PSE as it is Western Village. Without waiving this objection, each document is presently in the possession of PSE.

Since the electrical service installation, repair and maintenance of Puget Powers/Puget Sound Energy's system is the property and responsibility of Puget Sound Energy, we have no specific dates or records regarding the maintenance or upgrades of the electrical distribution system. At all times when there has been a maintenance or service issue with the primary lines or secondary lines leading to and including the meter, Puget Power/Puget Sound Energy has responded and repaired the problem.