EXHIBIT NO. ___(MBM-9)
DOCKETS UE-151871/UG-151872
PSE EQUIPMENT LEASING SERVICE
WITNESS: MALCOLM B. MCCULLOCH

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

Dockets UE-151871 UG-151872

PUGET SOUND ENERGY,

Respondent.

SECOND EXHIBIT (NONCONFIDENTIAL) TO THE PREFILED REBUTTAL TESTIMONY OF MALCOLM B. MCCULLOCH ON BEHALF OF PUGET SOUND ENERGY

PSE Data Request No. 037 to SMACNA-WW:

Does SMACNA-WW believe its individual members would engage in the negotiation and execution of service only, material only, or service and material only contracts, as defined by the service partner paths outlined on pages 15-17 of the Prefiled Direct Testimony of Malcolm B. McCulloch, prior to the Commission order approving the proposed Schedules 75?

RESPONSE:

See response of SMACNA-WW to PSE DR No. 001 that sets forth the purpose, structure, and role of SMACNA-WW and general objections 1-11 above.

SMACNA-WW objects further to the extent that it asks for a "belief" on a hypothetical and speculative outcome in the present docket and implies a number of unstated assumptions that could impact the outcome.

Without waiving those objections, SMACNA-WW states that it does not know whether any of its members would engage in contract negotiations with PSE prior to any Commission order approving Schedule 75.

Witness knowledgeable about and who can respond to questions concerning this response: Julie Muller-Neff.

Prepared by: Jeffrey D. Goltz

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Dated: May 19, 2016