

**EXHIBIT NO. ____ (MBM-10)
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.

PUGET SOUND ENERGY,

Respondent.

**Dockets UE-151871
UG-151872**

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

JULY 1, 2016

PSE Data Request No. 038 to SMACNA-WW:

What are the typical timeframe, inputs or commitments SMACNA-WW believes its individual member would expect when engaging in the negotiation and execution of:

- a. Service only contracts with third-party partners?
- b. Material only contracts with third-party partners?
- c. Service and material contracts with third-party partners?

RESPONSE:

SMACNA-WW contacted PSE regarding this data request as it appeared to ask whether SMACNA-WW members would enter into contracts with third-party partners, which, as we understand it, is not contemplated by the proposed lease tariff. In response to our inquiries, PSE suggested the following rephrasing as a clarification:

What are the typical timeframes, inputs or commitments SMACNA-WW believes its individual members would expect when engaging in the negotiation and execution of:

- a. Service only contracts, associated to the proposed schedules, with PSE?
- b. Material only contracts, associated to the proposed schedules, with PSE?
- c. Service and material contracts, associated to the proposed schedules, with PSE?

Accordingly, we respond as follows to this rephrased question.

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.

Further, if PSE intended to seek SMACNA-WW’s views on expectations of its members in negotiating and executing contracts with PSE, then that request is premature.

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

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Dated: May 19, 2016