

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-111048

Docket No. UG-111049

DECLARATION OF
MELINDA J. DAVISON IN SUPPORT
OF ICNU'S RESPONSE IN OPPOSITION
TO PSE'S MOTION OBJECTING TO THE
CONFIDENTIALITY STATUS OF ICNU

1 I, Melinda J. Davison, hereby declare under penalty of perjury under the laws of the State
of Washington that the following is true and correct:

2 I am an attorney representing the Industrial Customers of Northwest Utilities ("ICNU")
in this proceeding. I have personal knowledge of the matters set forth in this Declaration.

3 I attest that I have not reviewed any information designated as highly confidential or
confidential in the instant proceeding. I never intended to sign the highly confidential protective
order agreement in this case and did so by mistake.

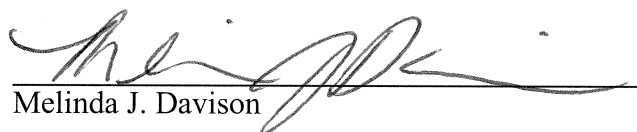
4 I confirm that via email on August 15, 2011, I informed Ms. Sheree Strom Carson, lead
counsel for Puget Sound Energy, Inc. ("PSE"), that I did not intend to sign the highly
confidential protective order agreement in these proceedings and that I had not reviewed any
highly confidential material. I informed Ms. Carson that the mistake would be corrected and
that ICNU attorney Jesse Cowell would be the only attorney who would sign highly confidential

material at our firm's office. I assured PSE that Mr. Cowell would take all necessary precautions to ensure that there would be no inadvertent disclosure of highly confidential information.

5 Ms. Carson did not call or email me to inform me of this dispute prior to filing PSE's Motion in this matter, contrary to the requirements of the Commissions rules as I consider this to be a discovery dispute or similar to a discovery dispute.

6 We are willing to work with PSE to ensure that their concerns are addressed.

Executed this 1st day of September, 2011, at Portland, Oregon.


Melinda J. Davison