

Exhibit No. ___ (KSC-10)
Docket No. PG-041624
Witness: Kuang-Shi Chu

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET NO. PG-041624

**EXHIBIT TO
TESTIMONY OF**

Kuang-Shi Chu

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE's Response to Staff Data Request No. 88

July 21, 2005

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

Docket No. PG-041624

**Complaint Regarding Natural Gas Incident and House Fire
September 2, 2004; Bellevue, WA**

WUTC STAFF DATA REQUEST NO. 88

WUTC STAFF DATA REQUEST NO. 88:

1. Please confirm or deny that PSE was providing cathodic protection to the Spirit Ridge neighborhood in 2004 because active corrosion (for purposes of 49 C.F.R. § 457(b)) was found in the area prior to then.
2. If your response is a denial, please state the reasons why PSE was providing cathodic protection to the Spirit Ridge neighborhood in 2004, and provide the documents that support your response.

If your answer to Item 1 of this data request is a denial, please provide:

- a) All information and documents that demonstrate that PSE complied with 49 C.F.R. § 292.465(e) with respect to the gas pipeline system PSE has operated in the Spirit Ridge neighborhood.
- b) All reports PSE filed with the WUTC, if any, pursuant to the language in WAC 480-93-110 that stated: "Whenever a gas company finds from investigation as required by 49 CFR, Part 192, that cathodic protection of gas pipeline is not needed, the company shall submit to the commission a report setting forth good and sufficient reasons why such protection is not required. The report shall include the results of soil tests and other supporting data."

Supplemental Response:

1. PSE has no evidence of active corrosion in the Spirit Ridge neighborhood. PSE's predecessor, WNG, previously decided to provide cathodic protection to buried coated distribution lines installed before August 1, 1971 regardless of whether active corrosion existed. As such, the distribution system in the Spirit Ridge neighborhood was provided cathodic protection in accordance with applicable regulations prior to and including all of 2004.

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2. Because PSE was voluntarily providing cathodic protection to the Spirit Ridge neighborhood, no responsive documents exist.