

Exhibit No. ___ (KSC-13)
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. 77

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 INFORMAL DATA REQUEST NO. 77

Regarding the Vasa Park Rectifier located at the intersection of 163rd Avenue S.E. and 164th Place in Bellevue Washington, PSE's response to Staff Data Request No. 51 a page 6, states: "9/3/04: Rectifier found. Pipe wire connected to positive terminal, anode wire connected to negative terminal."

Please:

- 1) State whether the description quoted above describes a mis-wired condition. If you answer is not affirmative, please fully explain your response.
- 2) State the time period (start and end dates) when the rectifier was wired as described in the above quote, and explain how you determined that time period.
- 3) State the name of the person (and his/her position and employer) who wired the rectifier in the manner described in the above quote, and explain how it came to be wired that way.
- 4) State the impact the above-quoted wiring configuration had on PSE's metallic pipe connected to that rectifier during the period stated in your response to item 2) above:
- 5) Identify the person (and his/her position and employer), who found the wiring in the condition quoted above, the name of the person (and his/her position and employer) who correctly re-wired the rectifier, and confirm date the rectifier was correctly re-wired was September 3, 2004.
- 6) Please state the date(s) when handwritten "+" and "-" designations were placed:
 - a) on the rectifier body under the terminals
 - b) on the leads that attach to the terminalsand also identify the person (and his/her position and employer) who placed those designations on the rectifier and leads, respectively, and why.
- 7) Please state whether the rectifier was padlocked during the period June 30, 2004, and September 3, 2004 (except for the time it may have been opened for servicing

WUTC Staff Data Request No. 77
Date of Response: June 21, 2005
PG-041624

by PSE personnel or PSE authorized personnel), and provide the support for your response.

Response (Corrected June 28, 2005):

- 1) Yes.
- 2) PSE has an EPCR from June 30, 2004 that indicates that the rectifier was wired properly. On September 3, 2004, the wiring on the rectifier was then examined by a PSE employee. At that time, PSE discovered for the first time that it was cross-wired. There is no other information indicating that a PSE employee or agent examined the VASA Park Rectifier wiring between these two dates. While an employee did visit the rectifier on August 2, this was for routine maintenance and did not include an inspection of the wiring.

From this information, PSE concluded that sometime between June 30, 2004 and September 3, 2004, someone accessed the rectifier and reversed the wires. However, we do not know how long the rectifier remained in this cross-wired condition. PSE only knows that the maximum amount of time it could have been cross-wired was from June 30, 2004 – September 3, 2004.

- 3) Despite efforts to identify the person or company that changed the wiring on the rectifier, PSE has thus far been unable to determine who cross-wired the rectifier. PSE did review all PSE records and confirmed that there is no record of a PSE employee visiting the VASA Park Rectifier between June 30, 2004 and September 3, 2004, other than the August 2, 2004 maintenance visit. Similarly, PSE's authorized agents reviewed their records and found no indication that any of their employees had occasion to visit the VASA Park Rectifier during this time period (this is consistent with PSE's policy that only PSE employees can examine or work on PSE rectifiers).
- 4) Please see the summary letter from CC Technologies, dated February 28, 2005 (also provided in response to DR 47 and 48).
- 5) Ed Voogt (PSE Corrosion Technician) first discovered the cross-wiring on September 3, 2004 and immediately corrected the situation so that the rectifier was once again properly wired.
- 6) There are no records that indicate when the markings were made. However, PSE employee Dick Polkinghorn indicated that he believes he made the marks quite some time ago.

WUTC Staff Data Request No. 77
Date of Response: June 21, 2005
PG-041624

- 7) After June 30, 2004, the next visit to the VASA Park Rectifier was on August 2, 2004, when Dick Polkinghorn visited the rectifier for maintenance purposes (see DR 76). However, Mr. Polkinghorn asserts that he put the padlock back on the rectifier cover after performing his maintenance. The next reported visit by a PSE employee was on September 3, 2004, when Ed Voogt examined the wiring. Mr. Voogt reported that the rectifier box was locked when he arrived. Upon removing the cover, Mr. Voogt discovered that the rectifier had been cross-wired. However, there were signs that the padlocked cover for the rectifier had been opened without the use of a key by removing the cover from the hinges. Mr. Voogt was able to repeat this form of forced entry when he examined the rectifier on September, 3, 2004.