Exhibit No. ___ (KSC-18)
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. 85

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 NOs. 85

WUTC STAFF DATA REQUEST NO. 85:

This Data Request is a follow-up to your Response to Staff Data Request No. 77.

a) In part 7 of PSE's Response, PSE stated in part:

> "[PSE employee] Mr. Voogt reported that [on September 3, 2004] the rectifier box was locked when he arrived."

1) Does this response mean that the padlock was attached to the front of the rectifier and the cover could not be lifted off the bottom part of the rectifier because the lock was attached at that point? If not, please explain what "locked" means in your response.
2) Please explain why Mr. Voogt visited the rectifier on September 3, 2004, i.e., did PSE assign him to do that, was this his own idea, etc.
3) Please provide Mr. Voogt's notes relating to his visit to the rectifier on September 3, 2004.

b) In Part 7 of PSE's Response, PSE also stated in part:

> "Upon removing the cover, Mr. Voogt discovered that the rectifier had been cross-wired."

Please explain how Mr. Voogt removed the cover, including a statement whether he had a key to the padlock and unlocked the padlock.

c) In Part 7 of PSE's Response, PSE stated in part:

> "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."

1) Please explain what is meant by "hinges," because it appeared to staff that the rectifier front was held on by hex screws, not hinges.

2) Please describe in detail the "signs" referred to in the above quote.
3) Did Mr. Voogt leave the rectifier padlocked? Of not explain why not. If so, please explain how it came to be in an unlocked position when PSE and Staff personnel visited the rectifier in the afternoon of September 3, 2004.
4) Please provide all notes, summaries and reports prepared or contributed to by Mr. Mulkey, Mr. Drake and Mr. Schwartz regarding what they saw on September 3, 2004 relating to the rectifier or matters related to the explosion on September 2, 2004.

b) Please describe the steps PSE has taken, if any, to secure the rectifier and prevent the form of "forced entry" referred to in part 7 of your Response.

Supplemental Response:

a)

1) Yes.

2) Mr. Voogt visited the Vasa Park Rectifier on 9/03/04 as part of his investigation surrounding the tragic explosion on 9/02/04.

3) See Attached.

b) Mr. Voogt did have a key to the padlock when he visited the Vasa Park Rectifier on 9/03/04. However, he was able to remove the cover from the hinges without the use of the key to gain access and continue to assist with the investigation of the tragic explosion on 9/02/04. Even with the key for the padlock, the hinges would have to be removed to check the wiring. By removing the cover from the hinges, the padlock effectively became the hinge.

c)

1) At the time of the discovery on 9/03/04, PSE used long shank padlocks. By removing the screws at the top of the panel, Mr. Voogt was able to slide down the cover open the panel without the necessity of the key to the padlock.

The rectifier cabinet was designed with an overhang on top and two 90 degree bends in the sides. Two screws then hold the face plate to the top of the cabinet and a padlock secured the bottom of the cabinet. When the screws were removed, the face plate slid down and exposed the inside of the rectifier.

PSE has attached a color photograph of the door at the Vasa Park Rectifier before the padlock was replaced as described in part (d).

2) It appeared that this type of entry (removal of the cover without the use of the key to the padlock) had been used in the past to gain access to the rectifier.

Specifically, it appeared that the screws had been removed previously. With the screws removed, the face plate would simply slide down and the individual removing the screws could then gain access to the rectifier . There were no other signs of entry without a key.

3) Yes. Mr. Voogt left the rectifier padlocked. When Staff and PSE visited the Rectifier on 9/03/04, it was not unlocked. Rather, access was gained by the same method as described in DR 84 c) 1) above.

4) Mr. Drake's notes are attached, but Mr. Mulkey and Mr. Schwartz did not take any notes.

d) All padlocks have been replaced. The new padlocks have a short shank so that the front panels of the rectifiers cannot be removed without unlocking and removing the padlock. Only personnel directly involved in the corrosion control work have keys to the padlocks.