

**EXHIBIT NO. ___(HVS-3)
DOCKET NO. PG-041624
WITNESS: HARRY V. SHAPIRO**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. PG-041624

**SECOND EXHIBIT TO THE PREFILED DIRECT TESTIMONY OF
HARRY V. SHAPIRO (NONCONFIDENTIAL)
ON BEHALF OF PUGET SOUND ENERGY, INC.**

AUGUST 15, 2005

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: 6/23/05 & 7/21/05
CASE NO.: PG-041624
REQUESTER:PSE

WITNESS: Dr. Bell
RESPONDER: Dr. Bell
TELEPHONE: 360-664-1189

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PSE DATA REQUEST NO. 1 TO WUTC STAFF:

With respect to paragraph 1 of the WUTC Notice of Emergency Adjudication, please provide all support for the statement that "PSE incorrectly installed a VASC [sic] Park Rectifier that caused the September 2, 2004, explosion at the house located at 16645 S.E. 26th Place, Bellevue, Washington."

OBJECTION by Commission Counsel:

The Commission made clear that instead of the language quoted in your data request: "The notice should have read: The complaint alleges that corrosion in the service line caused the September 2, 2004, explosion at the house located at 16645 Southeast 26th Place, Bellevue, Washington, and that the incorrect configuration of a VASC [sic] Park Rectifier may have caused a dangerous condition which may present an immediate danger to the public health, safety and welfare." Tr. 8, line 22 to Tr. 9, line 7.

Accordingly, it is inappropriate to characterize the notice as your data request does, and Staff objects for that reason. Without waiving that objection, Staff makes the following response:

RESPONSE:

To the extent your data request is to be interpreted as asking whether Staff has concluded that PSE's cross-wired rectifier played a role in the explosion, Staff is still investigating the impact of the cross-wiring. Consequently, assuming your data request is seeking such information, it is premature. Staff will supplement this request when its investigation is complete.

SUPPLEMENTAL RESPONSE (7/21/05):

According to the testimony of Dr. Bell, filed on July 21, 2005, the gas leak at 16645 SE

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26th Place in Bellevue which caused the September 2, 2004 explosion was a result of external corrosion on the service line prior to the explosion. The leak most likely occurred prior to the mis-wiring of the rectifier. However, as Dr. Bell explains, once the service line was removed, it was no longer possible to determine the exact impact of the cross-wired rectifier on the service line to the house because the electrical configuration of the system had been altered.