

**EXHIBIT NO. ___(HVS-4)
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

**THIRD 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

PSE DATA REQUEST NO. 6 TO WUTC STAFF:

With respect to paragraph 26 of the WUTC Complaint, do you still contend that "the uncertainty surrounding the precise effects of the rectifier's failure to provide adequate protection has created an emergency requiring prompt action." If so, please provide all support for that contention.

RESPONSE:

Staff is still investigating this issue. The Staff's analysis of the impact of the cross-wired rectifier is not complete. Consequently, your request is premature. Staff will supplement this request when its investigation is complete. However, Staff believes the actions PSE was ordered to take in Commission Order No. 1 in this docket were properly designed.

SUPPLEMENTAL RESPONSE (July 21, 2005):

Staff firmly believes the uncertainty surrounding the cross-wired rectifier fully justified the prompt action the Commission took.

Staff believes there is less uncertainty now regarding the time period the rectifier was cross-wired. According to the testimony of Mr. Kuang-Shi Chu, filed on July 21, 2005, that period was at least 5 days and at most 64 days.

On the other hand, as Dr. Bell testifies, in testimony filed on July 21, 2005, there is no ability to measure the impact of the cross-wiring on the Schmitz house service line. In addition, the investigation of the integrity of the pipe in the Spiritridge area has revealed other safety issues that PSE needs to address.