

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket No. PG-160924
Puget Sound Energy
Greenwood Complaint**

PUBLIC COUNSEL DATA REQUEST NO. 031

PUBLIC COUNSEL DATA REQUEST NO. 031:

Refer to Puget Sound Energy response to WUTC Staff DR No. 019 on Puget Sound Energy or its agent failing to disconnect the line from all sources of gas.

Please identify what records PSE has relied on to conclude that "... its records show that a ¾" service line in the vicinity of the building located at 8411 Greenwood Ave North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004 in accordance with federal regulations and PSE operating procedures." Provide any documents that support this conclusion with specific reference to page numbers of any attachments.

Response:

Please see Puget Sound Energy's Response to WUTC Informal Data Request No. 019.

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**Docket No. PG-160924
Puget Sound Energy
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PUBLIC COUNSEL DATA REQUEST NO. 032

PUBLIC COUNSEL DATA REQUEST NO. 032:

Refer to Puget Sound Energy response to WUTC Staff DR No. 020 on Puget Sound Energy or its agent failing to purge the line.

Please identify what records PSE has relied on to conclude that "...its records show that a ¾" service line in the vicinity of the building located at 8411 Greenwood Ave North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004 in accordance with federal regulations and PSE operating procedures." Provide any documents that support this conclusion with specific reference to page numbers of any attachments.

Response:

Please see Puget Sound Energy's Response to WUTC Informal Data Request No. 019.

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PUBLIC COUNSEL DATA REQUEST NO. 033

PUBLIC COUNSEL DATA REQUEST NO. 033:

Refer to Puget Sound Energy response to WUTC Staff DR No. 021 on Puget Sound Energy or its agent failing to seal the ends of the line.

Please identify what records PSE has relied on to conclude that "...its records show that a 3/4" service line in the vicinity of the building located at 8411 Greenwood Ave North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004 in accordance with federal regulations and PSE operating procedures." Provide any documents that support this conclusion with specific reference to page numbers of any attachments.

Response:

Please see Puget Sound Energy's Response to WUTC Informal Data Request No. 019.

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PUBLIC COUNSEL DATA REQUEST NO. 034

PUBLIC COUNSEL DATA REQUEST NO. 034:

Refer to Puget Sound Energy response to WUTC Staff DR No. 022 on whether or not Puget Sound Energy contends that the service line was inactive between September 1, 2004, and March 9, 2016.

Please identify what records PSE has relied on to conclude that "...its records show that a ¾" service line in the vicinity of the building located at 8411 Greenwood Ave North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004 in accordance with federal regulations and PSE operating procedures." Provide any documents that support this conclusion with specific reference to page numbers of any attachments.

Response:

Please see Puget Sound Energy's Response to WUTC Informal Data Request No. 019.

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PUBLIC COUNSEL DATA REQUEST NO. 035

PUBLIC COUNSEL DATA REQUEST NO. 035:

Refer to Puget Sound Energy response to WUTC Staff DR No. 023.

The answer is not responsive to the question. The question is about maintenance or monitoring of the active service line after September 1, 2004 not about line deactivation or abandonment. Please answer the question directly.

Response:

Puget Sound Energy does not contend that it maintained or monitored the service line after September 1, 2004.

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WUTC STAFF DATA REQUEST NO. 019

WUTC STAFF DATA REQUEST NO. 019:

In your Answer and Affirmative Defenses, you denied paragraph 11 of the WUTC Complaint, which alleged, "On or about September 1, 2004, PSE or its agent failed to disconnect the line from all sources of gas." State whether you contend that, on or about September 1, 2004, PSE or its agent disconnected the line from all sources of gas.

Response:

Puget Sound Energy's ("PSE") records show that a 3/4" service line in the vicinity of the building located at 8411 Greenwood Avenue North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004, in accordance with federal regulations and PSE standard operating procedures. After the Greenwood incident, it was discovered that Pilchuck failed to perform the work as instructed.

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WUTC STAFF DATA REQUEST NO. 020

WUTC STAFF DATA REQUEST NO. 020:

In your Answer and Affirmative Defenses, you denied paragraph 12 of the WUTC Complaint, which alleged, "On or about September 1, 2004, PSE or its agent failed to purge the line." State whether you contend that, on or about September 1, 2004, PSE or its agent purged the line.

Response:

Puget Sound Energy's ("PSE") records show that a 3/4" service line in the vicinity of the building located at 8411 Greenwood Avenue North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004, in accordance with federal regulations and PSE standard operating procedures. After the Greenwood incident, it was discovered that Pilchuck failed to perform the work as instructed.

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WUTC STAFF DATA REQUEST NO. 021

WUTC STAFF DATA REQUEST NO. 021:

In your Answer and Affirmative Defenses, you denied paragraph 13 of the WUTC Complaint, which alleged, "On or about September 1, 2004, PSE or its agent failed to seal the ends of the line." State whether you contend that, on or about September 1, 2004, PSE or its agent sealed the ends of the line.

Response:

Puget Sound Energy's ("PSE") records show that a 3/4" service line in the vicinity of the building located at 8411 Greenwood Avenue North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004, in accordance with federal regulations and PSE standard operating procedures. After the Greenwood incident, it was discovered that Pilchuck failed to perform the work as instructed.

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WUTC STAFF DATA REQUEST NO. 022

WUTC STAFF DATA REQUEST NO. 022:

In your Answer and Affirmative Defenses, you denied paragraph 14 of the WUTC Complaint, which alleged, "The service line remained active until deactivated after the March 9, 2016 explosion." State whether you contend that the service line was inactive between September 1, 2004, and March 9, 2016.

Response:

Puget Sound Energy's ("PSE") records show that a 3/4" service line in the vicinity of the building located at 8411 Greenwood Avenue North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004, in accordance with federal regulations and PSE standard operating procedures. After the Greenwood incident, it was discovered that Pilchuck failed to perform the work as instructed.

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WUTC STAFF DATA REQUEST NO. 023

WUTC STAFF DATA REQUEST NO. 023:

In your Answer and Affirmative Defenses, you denied paragraph 15 of the WUTC Complaint, which alleged, "PSE performed no required maintenance or monitoring of the active service line after September 1, 2004." State whether you contend that PSE maintained and monitored the line after September 1, 2004.

Response:

Puget Sound Energy's ("PSE") records show that a 3/4" service line in the vicinity of the building located at 8411 Greenwood Avenue North was properly deactivated and abandoned by PSE's contractor, Pilchuck, on or about September 1, 2004, in accordance with federal regulations and PSE standard operating procedures. After the Greenwood incident, it was discovered that Pilchuck failed to perform the work as instructed.