

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WALLA WALLA COUNTRY CLUB,	)	
	)	
Complainant,	)	DOCKET UE-143932
	)	
v.	)	
	)	
PACIFIC POWER & LIGHT	)	
COMPANY,	)	
	)	
Respondent.	)	
_____	)	

**EXHIBIT NO. WGC-\_\_\_CX**

**COMPANY RESPONSE TO CLUB DR 87**

**August 27, 2015**

087 Are there safety or operational reasons that would exist to justify the removal of Club facilities, once the net book value of the facilities had been paid for by the Club and the facilities sold to the Club? If yes, please explain.

**RESPONSE:** Yes. The National Electric Safety Code imposes continuing duties and liability. Net book value does not cover the entirety of the negative financial impact upon remaining customers. Pacific Power would have no access to the facilities on the property of Complainant. As previously stated, abandoning facilities poses a risk of harm to workers performing excavation and/or other tasks in the area. If a worker performing excavation discovers empty conduit, he or she may continue digging, on the assumption that there is only abandoned conduit in the area. However, in the process of additional digging, he or she may encounter an energized circuit. Failing to remove underground facilities creates a safety risk, as a worker may fail to perceive a necessity of securing locates. Empty conduit only increases that possibility. Complainant would have no means to locate the subject facilities.