

**Exh. ECO-8
Dockets UE-170033/UG-170034
Witness: Elizabeth O'Connell**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-170033 and
UG-170034 (*Consolidated*)**

**EXHIBIT TO
TESTIMONY OF**

Elizabeth C. O'Connell

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE's response to Staff data request 280.

June 30, 2017

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-170033 and UG-170034
Puget Sound Energy
2017 General Rate Case**

WUTC STAFF DATA REQUEST NO. 280

WUTC STAFF DATA REQUEST NO. 280:

RE: Environmental Remediation Projects adjustment

Does PSE conduct an initial environmental remediation assessment as part of its evaluation for new projects at the generation, transmission, or distribution level? If yes, please describe the process for those initial environmental remediation assessments.

Response:

Yes. Puget Sound Energy's ("PSE") due diligence process for property acquisitions spanning the generation, facilities and transmission and distribution related purchases, includes an environmental review consistent with the All Appropriate Inquiries ("AAI") standards published by EPA. A recent example is associated with the South King County facility purchase. An outside consultant with the technical qualifications and expertise to perform an AAI was hired to assist PSE in the full study and evaluation of the property prior to the purchase. In doing so, PSE is afforded the ability to qualify for landowner liability protections provided by the federal Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), including, among others, the "innocent landowner" and "contiguous landowner" defenses within CERCLA.