

EXHIBIT B

Compilation of Toscos Data Requests

Before the Federal Energy Regulatory Commission

Docket No. IS01-441-000

FIRST SET OF DISCOVERY REQUESTS OF TOSCO CORPORATION DIRECTED TO OLYMPIC PIPE LINE COMPANY

INITIAL DATA REQUESTS

1. Please provide complete copies of Olympic's responses to all discovery requests submitted to Olympic by other parties to this proceeding, including the Commission Staff.
2. Please provide the workpapers underlying the direct testimony and exhibits of all Olympic witnesses in this proceeding. To the extent available in electronic form, please provide them in both electronic and document form.
3. Please provide monthly volumes for all origin and destination pairs (separately reported for interstate and intrastate volumes) for the periods 1990 to the present. To the extent available in electronic form, please provide them in both electronic and document form.
4. Please provide the mileage between all origin and destination pairs (both interstate and intrastate). Please provide the current mileage and note if and when any changes in mileage have occurred. Please provide the mileage before and after any change.
5. Please provide the operational capacity (in barrels per day) for each pipeline segment applicable to each origin and destination pair (both interstate and intrastate) by month for the period 1990 to present. To the extent available in electronic form, please provide them in both electronic and document form.
6. Please provide all documents related to the time when Olympic's pipeline operational capacity which was affected by the June 10, 1999, rupture is expected to return to the operational capacity level which existed prior to the rupture.
7. Please provide a breakdown of Olympic's annual non-carrier revenues by category (and provide an explanation of the categories selected by Olympic) for the period 1995 to the present. If Olympic does not record non-carrier revenues by categories, please provide annual non-carrier revenues and provide an explanation of all products that contribute to non-carrier revenues.

8. Please provide power costs by station and by month for all pumping stations. Please provide the Kwhs used per month and the average electricity price paid for each month (or the total electricity cost paid per month). To the extent available in electronic form, please provide them in both electronic and document form.
9. Please provide all budgets and forecasts of costs and operations for the years 1999, 2000, 2001, and 2002. Please provide all documents that compare the budgets and forecasts to actual results. To the extent available in electronic form, please provide them in both electronic and document form.
10. Please provide Exhibits Nos. OPL-30 and OPL-31 in electronic format with all links intact. Please provide all underlying electronic spreadsheets which calculate data inputs (e.g. ADIT amounts) into OPL-30 and OPL-31.
11. For each Operation and Maintenance (“O&M”) and Administrative and General (“A&G”) account, please identify the amount of any reserve or accrual (i.e., non-cash) expense contained in the figures on Schedule 2 of Exhibit Nos. OPL-30 and OPL-31. Please provide an explanation as to each such reserve or accrual item.
12. For each O&M and A&G account shown on pages 302-303 of Olympic’s 1997 through 2000 FERC Form No. 6, please identify the amount of any reserve or accrual expense contained in the figures.
13. With regard to Exhibit No. OPL-28, page 17, line 11, please identify the docket numbers and FERC Staff witnesses to which Mr. Collins is referring when he states, “I have relied on the approach that FERC Staff has used in other cases....”
14. For 1997, 1998, the Base Period, and the Test Period, please identify all major (i.e., greater than \$250,000) investments which led to the increases in Depreciable Carrier Property shown on Schedule 5 of Exhibit No. OPL-31. Please provide documents related to the projected and actual amounts of such investments, including but not limited to authorizations for expenditures (“AFEs”) or project completion reports. To the extent available in electronic form, please provide them in both electronic and document form.
15. Please provide a breakdown by region (or other categorization employed by the State of Washington) of the Property Taxes and Franchise Taxes shown in Schedule 21.12 of both Exhibit Nos. OPL-30 and OPL-31 for both the Base Period and the Test Period. To the extent available in electronic form, please provide them in both electronic and document form.
16. Please provide an explanation of the Property Tax valuation method employed by the State of Washington together with the 1999, 2000, and 2001 valuations for Olympic.

17. Please provide an explanation of the Franchise Tax valuation method employed by the State of Washington together with the 1999, 2002, and 2001 valuations for Olympic.
18. With regard to Schedule 21.3, Lines 1 and 2, of both Exhibit Nos. OPL-30 and OPL-31, please provide a breakdown of these amounts by employee name, with the employee's position, and the employee's amounts of salary, benefits and payroll taxes. Please indicate the amounts of each employee's salary, benefits, and payroll taxes that were classified as O&M and General, respectively. To the extent available in electronic form, please provide them in both electronic and document form.
19. With regard to Accounts 300, 400, 500, and 550 of Olympic's 1998 and 1999 FERC Form No. 6, page 304, please provide a breakdown of these amounts by employee name, with the employee's position, and the employee's amounts of salary, benefits and payroll taxes. Please indicate the amounts of each employee's salary, benefits, and payroll taxes that were classified as O&M and General, respectively. To the extent available in electronic form, please provide them in both electronic and document form.
20. With regard to Schedule 21.4, Line 3, of Exhibit No. OPL-31, please provide a narrative discussion and a list of the principal items that give rise to the increase in Supplies/Maintenance Materials Expense.
21. With regard to Schedule 21.5, Line 3, of Exhibit No. OPL-31, please provide a breakdown of all O&M Outside Services expenses exceeding \$25,000. If no individual vendor or corporate affiliate accounted for expenses of greater than \$25,000 during the base period, please so state. To the extent available in electronic form, please provide them in both electronic and document form.
22. With regard to Schedule 21.5, Line 4, of Exhibit No. OPL-31, please provide a schedule of all General Outside Services expenses exceeding \$25,000. If no individual vendor or corporate affiliate accounted for expenses of greater than \$25,000 during the base period, please so state. To the extent available in electronic form, please provide them in both electronic and document form.
23. With regard to Schedule 21.5, Line 6, of Exhibit No. OPL-31,
 1. Please provide a breakdown of Operator Transition Costs by category (using whatever categories Olympic uses to classify such costs), and
 2. Please provide a narrative discussion which explains the basis for the Operator Transition Costs.
24. With regard to Schedule 21.5, Line 8 of Exhibit No. OPL-31, please provide a breakdown of all Outside Services. expenses exceeding \$25,000. If no individual vendor or corporate

affiliate accounted for expenses of greater than \$25,000 during the Test Period, please so state. To the extent available in electronic form, please provide them in both electronic and document form.

25. Please provide an explanation of the remediation projects and remediation cost projections contained in Schedule 21.1 of Exhibit No. OPL-31.
26. Please provide the analysis and documentation provided by BP's Global Environmental Management group referenced by Ms. Hammer at page 6, lines 7-11, of Exhibit No. OPL-27.
27. With regard to Schedule 21.6, Lines 1 and 4, of Exhibit Nos. OPL-30 and OPL-31, please provide a breakdown of these costs by location or facility. To the extent available in electronic form, please provide them in both electronic and document form.
28. Please provide a narrative explanation as to the cause of the Fuel & Power Adjustment listed at Line 5 of Schedule 21.6 of Exhibit No. OPL-31.
29. Please identify the individual responsible for preparing Olympic's Test Period Fuel & Power estimate on Line 1 of Schedule 21.6 of Exhibit No. OPL-31. Please also provide that individual's position and job responsibilities.
30. With regard to Schedule 21.8, Line 1, of Exhibit Nos. OPL-30 and OPL-31, please provide a breakdown of all Outside Services expenses exceeding \$25,000. If no individual vendor or corporate affiliate accounted for expenses of greater than \$25,000 during the Test Periods, please so state. To the extent available in electronic form, please provide them in both electronic and document form.
31. With regard to Schedule 21.8, Line 2, of Exhibit Nos. OPL-30 and OPL-31, please provide a breakdown of all expenses exceeding \$25,000. If no individual vendor or corporate affiliate accounted for expenses of greater than \$25,000 during the Base Periods, please so state. To the extent available in electronic form, please provide them in both electronic and document form.
32. With regard to Schedule 21.11, Lines 1 and 2, of Exhibit No. OPL-31, please provide a breakdown of both figures using the categories listed at Lines 1 through 8 of Schedule 21.11 of Exhibit No. OPL-30. To the extent that there are other major categories of insurance expense in Line 1, Schedule 21.11, of Exhibit No. OPL-31 which are not included in the categories listed in Exhibit No. OPL-30, please identify such categories and the amounts associated with each category. To the extent available in electronic form, please provide them in both electronic and document form.

33. Please identify the specific tariffs relied upon for each of the rates reported on Schedule 22.2 of Exhibit No. OPL-31.
34. Please provide a narrative explanation of how Olympic tracks its operating expenses. For example, does Olympic use location codes or some other system for categorizing expenses? Please provide any such category listings relied upon by Olympic.
35. To the extent Olympic categorizes operating expenses by location codes (or some other means), please provide any electronic database containing operating expenses for 1998, 1999, 2000, and 2001 which records expenses by location within each FERC account code. To the extent available in electronic form, please provide them in both electronic and document form.
36. Please provide a narrative explanation of how Olympic tracks its property investments. For example, does Olympic use location codes or some other system for categorizing property investments?
37. To the extent Olympic categorizes property investments by location codes (or some other means), please provide any electronic database containing property investments as of the end of the Test Period which records investments by location within each FERC account code. To the extent available in electronic form, please provide them in both electronic and document form.
38. With respect to the Direct testimony of Robert C. Batch in this proceeding (Exhibit Nos. OLP-1 through OLP-12),
 - a. Please state whether Mr. Batch has filed similar testimony with the WUTC in support of Olympic's request for a general increase in its rates and charges in Docket No. TO-011472.
 2. If the response to a above is affirmative, please identify and explain any material differences (regarding subject matter, conclusions, or methodology) between the Direct Testimony filed in this proceeding and the testimony filed with the WUTC.
39. With respect to the Direct Testimony of Bobby J. Tally in this proceeding (Exhibit Nos. OLP-13 through OLP-22),
 - a. Please state whether Mr. Tally has filed similar testimony with the WUTC in support of Olympic's request for a general increase in its rates and charges in Docket No. TO-011472.

3. If the response to a above is affirmative, please identify and explain any material differences (regarding subject matter, conclusions, or methodology) between the Direct Testimony filed in this proceeding and the testimony filed with the WUTC.
40. With respect to the Direct Testimony of William H. Beaver in this proceeding (Exhibit Nos. OLP-23 through OLP-26),
 - a. Please state whether Mr. Beaver has filed similar testimony with the WUTC in support of Olympic's request for a general increase in its rates and charges in Docket No. TO-011472.
 4. If the response to a above is affirmative, please identify and explain any material differences (regarding subject matter, conclusions, or methodology) between the Direct Testimony filed in this proceeding and the testimony filed with the WUTC.
41. With respect to the Direct Testimony of Cynthia A. Hammer and Brett A. Collins in this proceeding (Exhibit Nos. OLP-27 through OLP-33),
 - a. Please state whether Ms. Hammer and Mr. Collins have filed similar testimony with the WUTC in support of Olympic's request for a general increase in its rates and charges in Docket No. TO-011472.
 5. If the response to a above is affirmative, please identify and explain any material differences (regarding subject matter, conclusions, or methodology) between the Direct Testimony filed in this proceeding and the testimony filed with the WUTC.
42. With respect to the Direct Testimony of George R. Schink in this proceeding (Exhibit Nos. OLP-34 through OLP-48),
 - a. Please state whether Mr. Schink has filed similar testimony with the WUTC in support of Olympic's request for a general increase in its rates and charges in Docket No. TO-011472.
 6. If the response to a above is affirmative, please identify and explain any material differences (regarding subject matter, conclusions, or methodology) between the Direct Testimony filed in this proceeding and the testimony filed with the WUTC.