

EXHIBIT C

Compilation of Staff's Data Requests

Before the Washington Utilities and Transportation Commission

Docket No. TO-011472

WUTC STAFF DATA REQUEST NO. 1: Please provide copies of any and all data requests submitted to you by any party to this proceeding and your corresponding responses to those data requests.

INFORMAL WUTC STAFF DATA REQUEST NO. 1: Please explain the nature and source of the 2001 \$2,401,823 Other Revenue loss.

WUTC STAFF DATA REQUEST NO. 2: Please provide a copy of any response you make to any data request issued to you by any other party to this proceeding.

INFORMAL WUTC STAFF DATA REQUEST NO. 2: For both years, 2000 and 2001, provide an itemized listing by account of all operator-transition and/or non-recurring costs included in the expenses shown relating to the change in ownership and operation of the company. Identify which were incurred by BP and which by Equilon. Have any Balance Sheet accounts been charged for such items? If so, give the account and amount of each.

WUTC STAFF DATA REQUEST NO. 3: Please provide a copy of each note listed on page 3, lines 10-22 of Exhibit No. ____ (BCB-5)(the Supplemental Testimony of Bob Batch).

INFORMAL WUTC STAFF DATA REQUEST NO. 3: For both years, 2000 and 2001, provide an itemized listing by account of all safety, casualty, fines and penalties, clean-up and any other costs or expenses and insurance recoveries in any way related to the June 1999 Whatcom explosion or its aftermath. Have any Balance Sheet accounts been charged for such items? If so, give the account and amount of each.

WUTC STAFF DATA REQUEST NO. 4: Were the proceeds from any note listed on page 3, lines 10-22 of Exhibit No. ____ (BCB-5)(the Supplemental Testimony of Bob Batch), used to purchase the equity interest of GATX, or to pay costs associated with the Whatcom Creek incident? If so, please specify the note, the amount and its use..

INFORMAL WUTC STAFF DATA REQUEST NO. 4: For 2001 Transportation Revenue, give the actual amounts by origin and destination points by month through August 30th. For September through December, 2001, give the estimated monthly amounts at present rate levels, and the FERC + 62% temporary increase amounts. Provide all calculations, workpapers, details,

and assumptions that support the resulting four months of estimated data that when added to the actual data, yields the \$35,119,584 Transportation Revenue total for the year 2001.

WUTC STAFF DATA REQUEST NO. 5: For each note listed on page 3, lines 10-22 of Exhibit No. ____ (BCB-5)(the Supplemental Testimony of Bob Batch), please provide copies of each financing application made by Olympic, and each order entered by the Commission on such application, pursuant to RCW 81.08.030. The Commission Staff has (so far) located no such applications or orders, so Staff is requesting Olympic to provide the documents, if they exist. If Olympic did not file such applications, please explain why no such applications were filed.

INFORMAL WUTC STAFF DATA REQUEST NO. 5: For 2001, for each expense account, give the actual amounts by month for January through September, and the estimated amounts by account by month for October through December. Provide all calculations, workpapers, details, and assumptions that support the resulting four months of estimated data that when added to the actual data, yields the indicated 2001 account totals.

WUTC STAFF DATA REQUEST NO. 6: Please provide a copy of the complaint filed by Equilon and any answer filed by Olympic in the litigation described in Exhibit No. ____ (BCB-5)(the Supplemental Testimony of Bob Batch), at page 4, lines 4-7. Describe the current status of that case.

INFORMAL WUTC STAFF DATA REQUEST NO. 6: For 2000 and 2001, for each account by month, identify any amounts payable to any affiliated interest of BP or Equilon, for any goods or service supplied to Olympic. Separately state each item provided, the amount of the cost to the affiliate, the amount of the charge to Olympic, and the basis and supporting detail showing how those amounts were determined. Affiliated Interest is defined in RCW 81.16.010. Per the provisions of RCW 81.16, has Olympic ever filed an Affiliated Interest Agreement with the Commission? If not, please explain why not. If so, state the docket number for each filing.

WUTC STAFF DATA REQUEST NO. 7: In Exhibit No. ____ (BCB-5)(the Supplemental Testimony of Bob Batch), at page 4, lines 16-18, Mr. Batch testifies: "In management's best judgment, the safety-related capital investments Olympic has made and plans to make are prudent, reasonable, and in the best interests of the public and Olympic's shippers." Please provide for the calendar year 1999:

- A. List by project all significant new safety-related capital investments
- B. For each project, provide the total capital expenditure for that project

INFORMAL WUTC STAFF DATA REQUEST NO. 7: Please explain why Outside Services Expense decreases from \$19,031,953 in 2000, to \$5,995,604, in 2001? For each year separately identify the major components of each item in this account and the dollar amounts associated with each.

WUTC STAFF DATA REQUEST NO. 8: In Exhibit No. ____ (BCB-5)(the Supplemental Testimony of Bob Batch), at page 4, lines 16-18, Mr. Batch testifies: “In management’s best judgment, the safety-related capital investments Olympic has made and plans to make are prudent, reasonable, and in the best interests of the public and Olympic’s shippers.” Please provide for the calendar year 2000:

- A. List by project all significant new safety-related capital investments
- B. For each project provide the total capital expenditure for that project

INFORMAL WUTC STAFF DATA REQUEST NO. 8: Please explain why Administrative Services Expense increases from \$722,018 in 2000, to \$1,012,883 in 2001? For each year separately identify the major components of each item in this account and the dollar amounts associated with each.

WUTC STAFF DATA REQUEST NO. 9: In Exhibit No. ____ (BCB-5)(the Supplemental Testimony of Bob Batch) at page 4, lines 16-18, Mr. Batch testifies: “In management’s best judgment, the safety-related capital investments Olympic has made and plans to make are prudent, reasonable, and in the best interests of the public and Olympic’s shippers.” Please provide for the calendar year 2001:

- A. List by project all significant new safety-related capital investments
- B. For each project provide the total capital expenditure for that project

INFORMAL WUTC STAFF DATA REQUEST NO. 9: Please explain why Oil Loss Expense decreases from \$1,254,458 in 2000 to \$0 in 2001. For 2000, separately identify the major components of each item in this account and the dollar amounts associated with each.

WUTC STAFF DATA REQUEST NO. 10: In Exhibit No. ____ (BCB-1)(the Direct Testimony of Bob Batch) at page 9, lines 20-24 and continuing through page 11 line 2, Mr. Batch testifies to the actions taken by Olympic management to ensure safe and reliable pipeline transportation of products in Washington state. For each calendar year 1999, 2000 and 2001, please provide a detailed list of all expenditures for any of the items listed in that testimony that were not capitalized and listed in response to Staff Data Requests 7, 8 or 9.

INFORMAL WUTC STAFF DATA REQUEST NO. 10: Please explain why Miscellaneous Expenses have increased from \$1,912,980 in 2000 to \$3,160,256 in 2001. For each year separately identify the major components of each item in this account and the dollar amounts associated with each.

WUTC STAFF DATA REQUEST NO. 11: Do Olympic’s responses to Staff Data Requests 7 through 10 encompass, for calendar years 1999, 2000 and 2001, all expenditures that

were capitalized or expensed in each year, which were related to new systems/upgrades and safety improvements? If not, please provide the nature and amounts of any other expenditures related to new systems/ upgrades and safety improvements and indicate whether they were capitalized or expensed.

INFORMAL WUTC STAFF DATA REQUEST NO. 11: Please explain why Property Tax Expenses increases from \$635,587 in 2000 to \$1,236,085 in 2001. For each year separately identify the major components of each item in this account and the dollar amounts associated with each.

WUTC STAFF DATA REQUEST NO. 12: Referring to Exhibit No. ____ (BCB-6), Schedule D, Olympic Pipe Line Company Capital Expenditures, please provide:

- A. The interest rate the Company expects to incur as a result of financing the anticipated \$23.804 million of new capital expenditures in 2002.
- B. The amount of debt and the associated interest rate the Company expects to incur as a result of any amounts of new capital expenditures for the remainder of 2001.
- C. To whom the debt will be issued.

INFORMAL WUTC STAFF DATA REQUEST NO. 12: Please explain why Franchise Tax Expenses increases from \$385,361 in 2000 to \$669,468 in 2001. For each year separately identify the major components of each item in this account and the dollar amounts associated with each.

WUTC STAFF DATA REQUEST NO. 13: Please provide Olympic's response to Staff informal data request No. 4, as described in the attachment to Staff's November 20, 2001 letter to Olympic and the other parties.

INFORMAL WUTC STAFF DATA REQUEST NO. 13: Please explain why Interest Expense increases from \$7,570,150 in 2000 to \$8,803,002 for 2001. For each year, please provide a listing of all relevant long term debt by issue, stating the interest rate of each, and a monthly amortization schedule with beginning and ending principal amounts, and payments split between principal and interest.

WUTC STAFF DATA REQUEST NO. 14: Please provide Olympic's response to Staff informal data request No. 17, as described in the attachment to Staff's November 20, 2001 letter to Olympic and the other parties.

INFORMAL WUTC STAFF DATA REQUEST NO. 14: Please explain why Depreciation Expense decreases from \$2,732,883 in 2000 to \$2,545,688 for 2001. For each year, state whether depreciation is based on straight-line, or an accelerated basis. For each year,

please provide a straight-line basis depreciation schedule showing beginning asset and reserve balances by major asset category (see FERC Form 6, page 212), additions and deletions, current year depreciation expense, and ending asset and reserve balances. Use each schedule to develop an original cost rate base for each year, as well as all other appropriate additions and deductions such as deferred federal income tax.

INFORMAL WUTC STAFF DATA REQUEST NO. 15: For each year provide schedules showing all calculations, workpapers, details, and assumptions that support the Federal Income Tax amounts of \$9,541,996 for 2000 and \$7,242,953 for 2001. For each year show all amounts split between current and deferred portions, and show all related Balance Sheet accounts beginning balance, entries throughout the year, and ending balances.

INFORMAL WUTC STAFF DATA REQUEST NO. 16: Regarding Mr. Batch's testimony on Page 3 of Exhibit (BCB-1), attached to this letter, please provide a listing of all ongoing safety related costs or expenses incurred that "may never be able to be recovered" and not included in response to Items 2 and 3 above. Give the major components of each element for 2000 and 2001, the dollars associated with each, and what Balance Sheet or Income Statement account that has or will continue to be charged.

INFORMAL WUTC STAFF DATA REQUEST NO. 17: Regarding Mr. Batch's testimony on Page 9 and the related pie chart of Exhibit (BCB-4), attached to this letter, for each year, and for each of the 3 major categories indicated, list all expenses included naming the projects involved, the dollars associated with each, and what Balance Sheet and Income Statement account that has or will be charged. For the Mandatory Projects, state who is requiring them, and provide copies of relevant documents.

INFORMAL WUTC STAFF DATA REQUEST NO. 18: Please provide Olympic's budgets for 1997, 1998, 1999, 2000, and 2001.

INFORMAL WUTC STAFF DATA REQUEST NO. 19: Please describe Olympic's construction program for 2001 – 2002, and how Olympic expects to finance that construction program. List and describe all alternative financings Olympic has considered.

GENERAL RESPONSE TO WUTC STAFF REQUESTS 43-59

General Response:

The minutes and nonprivileged memoranda, reports, and other documentation provided to the members of Olympic's Board of Directors in their role as directors and responsive to these requests that have been located by Olympic after a diligent search have been provided in response to Tesoro Petroleum Company's Request for Production No. 13. These documents were sent to all parties by overnight mail on December 19 and December 26, 2001. It is important to note that many "reports" prepared for the Board were not written but were instead oral presentations.

Olympic has used its best efforts to locate responsive material including contacting individual Board members. Olympic's search continues and if additional responsive material is located the material will be immediately provided to all parties.

WUTC STAFF DATA REQUEST NO. 300: Provide Income Statement that supports Exhibit No. _____(CAH-4) for the twelve months ending September 30, 2001.

WUTC STAFF DATA REQUEST NO. 301: Provide Income Statement for the Budget year 2002 in same format as No. 1 above.

WUTC STAFF DATA REQUEST NO. 302: Provide all supporting documents, calculations and assumptions used to develop the company Budget year 2002 Income Statement.

WUTC STAFF DATA REQUEST NO. 303: Provide Income Statement for twelve months ending December 31, 2001 in same format as No. 1 above.

WUTC STAFF DATA REQUEST NO. 304: For schedule 21.3 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Salaries and Wages on lines 1 and 2.

WUTC STAFF DATA REQUEST NO. 305: For schedule 21.4 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Materials and Supplies on lines 1 and 2.

WUTC STAFF DATA REQUEST NO. 306: For Olympic Pipe Line Company, Proposed 2002 Income Budget provide all the supporting documents, calculations and assumptions in developing the "Fixed Bid" items.

WUTC STAFF DATA REQUEST NO. 307: For schedule 21.5 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Outsides Services on lines 1, 6 and 8.

WUTC STAFF DATA REQUEST NO. 308: Provide in writing an explanation of Financial System conversion that took place May of 2001.

WUTC STAFF DATA REQUEST NO. 309: For schedule 21.6 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Fuel and Power on lines 1, 2, 4 and 7.

FOLLOW-UP WUTC STAFF DATA REQUEST NO. 309: Provide in writing an explanation of why the company did not included in the Income Budget for 2002 adjustment for amortization of transition cost and remediation.

Olympic's response contains no information supporting the development of the DRA expenses shown on the Total DRA Costs line of Schedule 309B. Please supply the information requested.

WUTC STAFF DATA REQUEST NO. 310: Provide all supporting documents, calculations and assumption used to record Utilities/Operating Fuel and Power for the months of August, September, and November 2001 as reported on Olympic Pipe Line Company, statement of Income, Financial forecast for the year 2001.

WUTC STAFF DATA REQUEST NO. 311: For schedule 21.7 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Oil Losses on lines 1 and 2.

FOLLOW-UP WUTC STAFF DATA REQUEST NO. 311: For schedule 21.7 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Oil Losses on lines 1 and 2.

Olympic's response contains no information addressing how the \$550,000 Oil Loss Expense shown on Line 1 of Schedule 21.7, OPL-31, CAH-4 was computed. Please provide the information requested.

WUTC STAFF DATA REQUEST NO. 312: For schedule 21.8 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Other Expenses on lines 1, 2 and 3.

FOLLOW-UP WUTC STAFF DATA REQUEST NO. 312: For schedule 21.8 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Other Expenses on lines 1, 2 and 3.

Other than \$5,500 Issuance Expenses, Olympic's response contains no information addressing how the major items and amounts that comprise the \$3,221,000 Miscellaneous Expense category of the Fixed Bid in Schedule 306.1 were computed. Please provide the information requested.

WUTC STAFF DATA REQUEST NO. 313: For schedule 21.9 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Rentals on lines 1 and 2.

FOLLOW-UP WUTC STAFF DATA REQUEST NO. 313: For schedule 21.9 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Rentals on lines 1 and 2.

Olympic's response contains no information addressing how the major items and amounts that comprise the \$712,000 Rentals Expense category of the Fixed Bid in Schedule 306.1 were computed. Please supply the information requested.

WUTC STAFF DATA REQUEST NO. 314: For schedule 21.10 of Exhibit No. ____ (CAH-4), provide all supporting documents, calculations and assumptions used to develop Depreciation Expense on lines 1 and 2.

WUTC STAFF DATA REQUEST NO. 315: For schedule 21.11 of Exhibit No. ____ (CAH-4), provide all supporting documents, calculations and assumptions used to develop Insurance on lines 1 and 2.

WUTC STAFF DATA REQUEST NO. 316: For schedule 21.12 of Exhibit No. ____ (CAH-4), provide all supporting documents, calculations and assumptions used to develop Pipe Line Taxes on lines 1, 2, 4 and 5.

WUTC STAFF DATA REQUEST NO. 317: For schedule 22 of Exhibit No. ____ (CAH-4), provide all supporting documents, calculations and assumptions used to develop lines 35, 36 and 37.

FOLLOW-UP WUTC STAFF DATA REQUEST NO. 317: For schedule 22 of Exhibit No. ____ (CAH-4), provide all supporting documents, calculations and assumptions used to develop lines 35, 36 and 37.

Olympic's response contains no information addressing the derivation of either the 315,000 barrels of throughput on Line 35, the 3% Unplanned Downtime on Line 36, or the 3% Planned Downtime calculations on Line 37. Please supply the information requested.

WUTC STAFF DATA REQUEST NO. 318: For schedule 22.7 of Exhibit No. ____ (CAH-4), provide all supporting documents, calculations and assumptions used to develop lines 14 and 15.

WUTC STAFF DATA REQUEST NO. 319: For Income Statement for twelve months ending December 31, 2001 provide all supporting documents, calculations and assumptions to develop State Franchise Tax and Tax expense, Federal Income Tax - Current/Deferred and State Income tax.

FOLLOW-UP WUTC STAFF DATA REQUEST NO. 319: For Income Statement for twelve months ending December 31, 2001 provide all supporting documents, calculations and assumptions to develop State Franchise Tax and Tax expense, Federal Income Tax - Current/Deferred and State Income tax.

Olympic's response contains no information addressing the major items and amounts that comprise the \$1,260,000 Property Tax amount on Line 1, and the \$640,000 Franchise Tax amount on Line 2 of Schedule 21.12 of Exhibit No. ____ (CAH-4).

Nor was there any documents explaining the derivation of current and deferred Federal Income Tax Expense for calendar year 2001.

Please provide the information requested.

WUTC STAFF DATA REQUEST NO. 320: Provide a calculation for the achieved tax for the twelve months ending December 31, 2001.

FOLLOW-UP WUTC STAFF DATA REQUEST NO. 320: Provide a calculation for the achieved tax for the twelve months ending December 31, 2001.

Olympic's response did not provide any responsive information, and indicated the information was being prepared. Please provide the information requested. Provide the date when it will be provided.

WUTC STAFF DATA REQUEST NO. 321: For schedule 21.2 of Exhibit No. ____ (CAH-4), provide all supporting documents, calculations and assumptions used to develop Casualty Loss on lines 1 and 2. Is this account booked on cash basis or an accrual method?

WUTC STAFF DATA REQUEST NO. 322: Please provide any workpapers that have yet to be supplied, prepared by or for any Olympic witness in this docket.

WUTC STAFF DATA REQUEST NO. 323: Please provide a representative copy of the sort of economic studies typically performed by or for Olympic (or its operator) under:

- a. the July 1, 2000 Operating Agreement Section 4.2
- b. any analogous provision of any Operating Agreements in effect prior to the July 1, 2000 Operating Agreement
- c. identify any Olympic witness that can answer any questions about these studies

WUTC STAFF DATA REQUEST NO. 324: Please provide a representative copy of the "authority for expenditure" typically issued for Olympic (or its operator) under:

- a. the July 1, 2000 Operating Agreement Section 4.2
- b. any analogous provision of any Operating Agreements in effect prior to the July 1, 2000 Operating Agreement

c. identify any Olympic witness that can answer any questions about these authorizations

WUTC STAFF DATA REQUEST NO. 325: To the extent not supplied in response to Staff Data Request Nos. 323 and 324, please provide documents typical of the sorts of documentation actually used by Olympic to justify its decisions to construct, improve or maintain its pipeline by way of capital additions, since 1990.

WUTC STAFF DATA REQUEST NO. 326: For what periods of time has Olympic's pipeline capacity been prorated? ("Prorated" means Olympic has had more requests for service than capacity).

WUTC STAFF DATA REQUEST NO. 327: For what future periods of time does Olympic expect its pipeline capacity to be prorated?

WUTC STAFF DATA REQUEST NO. 328: Does Olympic's customer base change frequently, or do the same customers (or their successors and assigns) generally constitute the customer base? Explain your answer.

QUESTIONS RELATING TO THE TESTIMONY OF MR. BEAVER

WUTC STAFF DATA REQUEST NO. 329: Is it Olympic's belief that the Whatcom Creek explosion was caused by the backhoe damage referred to in Ex. ____ (WHB-1TC) at 4, line 16 to page 5, line 4? If not, please state the relevance of this testimony.

WUTC STAFF DATA REQUEST NO. 330: Which of the statements in 13, 14,15 and 16 of Ex. 43 for identification (page 10 of 18, line 4 to page 11 of 18, line 21) are credible, in Mr. Beaver's opinion? ("Credible" is used in the same sense as Mr. Beaver uses it in Ex. ____ (WHB-1TC) at 4, line 16).

QUESTIONS RELATING TO THE TESTIMONY OF MS. HAMMER

WUTC STAFF DATA REQUEST NO. 331: Do the amounts in Ex. ____ (OPL-31), Schedule 2 contain any amounts constituting charitable contributions? If so, please state the amount, and the account(s) in which it is found.

WUTC STAFF DATA REQUEST NO. 332: Do the amounts in Ex. ____ (OPL-31), Schedule 2 contain any amounts constituting expenses incurred related to Olympic's lobbying efforts directed toward current, proposed or possible legislation of local, state or federal government officials, representatives, legislators, or legislative bodies? If so, please state the amount, and the account(s) in which it is found.

WUTC STAFF DATA REQUEST NO. 333: Do the amounts in Ex. ____ (OPL-31), Schedule 2 contain any amounts constituting expenses incurred related to Olympic's advertising or public relations? If so, please state the amount, and the account(s) in which it is found. Produce representative copies of advertising and public relations efforts.

**QUESTIONS RELATING TO THE TESTIMONY OF
MS. OMOHUNDRO**

WUTC STAFF DATA REQUEST NO. 334: Please describe in detail what Olympic considers to be the "WUTC methodology." (Ex. ____ (CAO-3) at 3, line 19 and at 5, line 10).

WUTC STAFF DATA REQUEST NO. 335: Please describe in detail what Olympic considers to be "the federal oil pipeline methodology." (Ex. ____ (CAO-3) at 3, lines 21-22 and at 5, line 10 and lines 14-15).

WUTC STAFF DATA REQUEST NO. 336: Please describe what Olympic considers to be "rate uncertainty." (Ex. ____ (CAO-3) at 4, line 1).

WUTC STAFF DATA REQUEST NO. 337: Please describe what Olympic considers to be "regulatory uncertainty." (Ex. ____ (CAO-3) at 5, line 13-14).

WUTC STAFF DATA REQUEST NO. 338: Please define what Olympic considers to be an "essential service." (Ex. ____ (CAO-3) at 5, lines 13-14).

WUTC STAFF DATA REQUEST NO. 339: Please state at what level Olympic believes its pipeline transportation rates would be in order "to create an economic incentive to build more capacity to meet demand." (Ex. ____ (CAO-3) at 6, lines 18-21). State all assumptions and facts used in developing your answer. Produce all supporting documents.

WUTC STAFF DATA REQUEST NO. 340: Please state the prices used in Olympic's comparison of tanker or barge transportation with pipeline transportation to support Olympic's conclusion that tanker and barge rates are "higher." (Ex. ____ (CAO-3) at 6, lines 20-23). If any documents (other than Olympic's tariffs) were used to develop your answer, please produce them.

WUTC STAFF DATA REQUEST NO. 341: Please state the prices used in Olympic's comparison of tanker or barge transportation with pipeline transportation to support Olympic's conclusion that "the existence and pricing of substitutes....provides guidance as to the optimal level of pricing for pipeline transportation services." (Ex. ____ (CAO-3) at 7, lines 1-3). State all assumptions and facts used in developing your answer. Produce all supporting documents. If any documents (other than Olympic's tariffs) were used, please produce them. Include in your answer what Olympic believes is "the optimal level of pricing for pipeline transportation services."

WUTC STAFF DATA REQUEST NO. 342: Please state the facts on which Olympic concludes that "the Commission necessarily determined that such rates were fair, just reasonable and sufficient." Ex. ____ (CAO-3) at 8, lines 3-5. Produce any documents relied on. In particular, if you rely on any order or rule of the WUTC, please produce it.

WUTC STAFF DATA REQUEST NO. 343: Please state all facts and produce all documents supporting Olympic's testimony that "switching methodologies" would "not be sufficient to attract capital from the limited options Olympic has." Ex. ____ (CAO-3) at 9, lines 8-10. In your response, please specify the specific "limited options Olympic has."

WUTC STAFF DATA REQUEST NO. 344: Please provide any documents describing to Olympic's current plans to expand capacity to meet demand, other than to restore the pipeline to 100% pressure.

WUTC STAFF DATA REQUEST NO. 345: Please provide any rule (enacted pursuant to the APA) or any order of the Washington Utilities and Transportation Commission (or its predecessor) in which the Washington Utilities and Transportation Commission (or its predecessor) prescribed, found or concluded any particular rate methodology for Olympic Pipe Line Company to be appropriate.

WUTC STAFF DATA REQUEST NO. 346: Please describe the "federal methodology" used by Olympic in each tariff filing Olympic has made to the WUTC (other than the tariff filing instituting the instant docket). If the methodology changed, please describe the nature of the change.

WUTC STAFF DATA REQUEST NO. 347: Please identify who Olympic considers to be its "competitors." (Ex. ____ (CAO-3) at 9, line 11).

WUTC STAFF DATA REQUEST NO. 348: Is Olympic contending that it has a vested right in any particular ratemaking methodology? If so, please state the facts on which that contention is based, provide the documents on which that contention is based, and describe in detail the particular ratemaking methodology.

WUTC STAFF DATA REQUEST NO. 349: Is Olympic contending that the WUTC is estopped in this case from using a ratemaking method (such as the "WUTC methodology" referred to by Ms. Omohundro (Ex. ____ (CAO-3) at 3, line 19 and at 5, line 10) other than that currently used by the FERC? If so, please state the facts on which that contention is based, and provide the documents on which that contention is based.

WUTC STAFF DATA REQUEST NO. 350: Is Olympic contending that the WUTC would violate any constitutional or statutory right of Olympic Pipe Line Company if the WUTC used a ratemaking method such as the "WUTC methodology" referred to by Ms. Omohundro at Ex.

_____ (CAO-3) at 3, line 19 and at 5, line 10? If so, please state the facts on which that contention is based, and provide the documents on which that contention is based.

WUTC STAFF DATA REQUEST NO. 351: Please state the amount by which rates set using the "WUTC methodology" would be lower than rates set using the "federal oil pipeline methodology." (Ex. ____ (CAO-3) at 3, lines 19-22). Provide the documents supporting your calculation and explain how the calculation was performed.

WUTC STAFF DATA REQUEST NO. 352: Please define the parameters of what constitutes a "competitive market," as that term is used in Ex. ____ (CAO-3) at 6, line 13.

WUTC STAFF DATA REQUEST NO. 353: Please state for how long, and by what amount, Olympic's rates have been set "too low to bring supply and demand into balance." Ex. _____ (CAO-3) at 6, lines 17-18.

WUTC STAFF DATA REQUEST NO. 354: Please state the level Olympic's rates need to be in order to "allow the company to attract capital sufficient to create an economic incentive to build more capacity to meet demand." Ex. _____ (CAO-3) at 6, lines 18-21.

WUTC STAFF DATA REQUEST NO. 355: Please state the level to which Olympic's pipeline prices would rise, "in an unregulated market," so that "supply and demand would be in balance." Ex. _____ (CAO-3) at 6, line 23 to page 7, line 1.

QUESTIONS RELATING TO THE TESTIMONY OF MR. COLLINS

WUTC STAFF DATA REQUEST NO. 356: If the word "intrastate" is substituted for the word "interstate" in Ex. ____ (BAC-IT), page 3, lines 6 and 12, would the answer constitute true and correct testimony of Olympic in this proceeding for purposes of setting intrastate rates? If not, explain in detail why not.

QUESTIONS RELATING TO THE TESTIMONY OF MR. SCHINK

WUTC STAFF DATA REQUEST NO. 357: Please provide the price of waterborne transportation that Mr. Schink used in conducting his competitive analysis. Provide the supporting documents.

WUTC STAFF DATA REQUEST NO. 358: Please explain how "competition from other oil product suppliers may eliminate the ability of the oil pipeline to charge such higher rates." (Ex. ____ (GRS 1-T) at 24, lines 465-467)

WUTC STAFF DATA REQUEST NO. 359: Does Olympic intend the term "Commission" at page 25 of Ex. ____ (GRS 1-T) line 489 and page 26, line 503, and page 27, line 536, and page 28, line 538, and page 31, line 611-613, and page 32, line 621 and 626-27, and

page 34, line 657 and 661 and page 36, line 699, and page 39, line 749, and page 40, line 774 and 778, and page 41, line 803, and page 42, line 825, and page 43, line 844-46 and 849, and page 44, line 1, and page 47, line 903, and page 49, line 929, and page 50, line 950, and page 51, line 964, to refer to the Washington Utilities & Transportation Commission?

WUTC STAFF DATA REQUEST NO. 360: Please provide copies of all discovery in the FERC docket involving Olympic's current request to increase its interstate pipeline transportation rates. (This appears to be FERC Docket No. IS01-441-002, but to the extent the FERC rate matter involves other docket numbers, this data request is not limited to that docket).

WUTC STAFF DATA REQUEST NO. 361: For schedule 21.11 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Insurance on lines 1 and 2.

WUTC STAFF DATA REQUEST NO. 362: For schedule 21.12 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Pipe Line Taxes on lines 1, 2, 4 and 5.

WUTC STAFF DATA REQUEST NO. 363: For schedule 22 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop lines 35, 36 and 37.

WUTC STAFF DATA REQUEST NO. 364: For schedule 22.7 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop lines 14 and 15.

WUTC STAFF DATA REQUEST NO. 365: For Income Statement for twelve months ending December 31, 2001 provide all supporting documents, calculations and assumptions to develop State Franchise Tax and Tax expense, Federal Income Tax - Current/Deferred and State Income tax.

WUTC STAFF DATA REQUEST NO. 366: Provide a calculation for the achieved tax for the twelve months ending December 31, 2001.

WUTC STAFF DATA REQUEST NO. 367: For schedule 21.2 of Exhibit No. _____(CAH-4), provide all supporting documents, calculations and assumptions used to develop Casualty Loss on lines 1 and 2. Is this account booked on cash basis or an accrual method?

WUTC STAFF DATA REQUEST NO. 361: Please explain the basis for Olympic's financing strategy that led to Olympic having substantially more invested capital (\$41.8 million per Mr. Batch's Ex 2-T, page 3) than net carrier property as shown on Olympic's FERC Form 6, and explain in detail Olympic's financing or other plan to address that situation. (If \$141.8 million is not the correct amount of invested capital of Olympic, please state the correct amount, explain why it

differs from #141.8 million, and answer the data request accordingly). Produce any documents that described Olympic's overall financial strategy that covered (in whole or in part) the 1998-2001 period

WUTC STAFF DATA REQUEST NO. 362: Please provide any document (other than testimony, briefs or oral argument in this docket) in which Olympic analyzed the propriety of its debt issuance's in the context of what is an appropriate capital structure for Olympic.

WUTC STAFF DATA REQUEST NO. 363: Please state what Olympic believes is its long term, "target" capital structure. Explain in detail the basis for that belief and how and when Olympic expects to achieve that capital structure.

WUTC STAFF DATA REQUEST NO. 364: RCW 81.08.030, in referencing a common carrier's securities issuance's, requires every common carrier to maintain sufficient records "to enable the commission to ascertain the amount of money so expended and the purpose for which the expenditure was made.

WUTC STAFF DATA REQUEST NO. 365: Please state the date(s) when Olympic expects to have audited financial statements for 1999, 2000 and 2001.

WUTC STAFF DATA REQUEST NO. 366: Please explain why Olympic did not make the filings required by RCW 81.08.040 for the debt issuance's referenced in Mr. Batch's Ex. 2-T, page 3, other than the Prudential note and the Chase note. If Olympic did make the filings, please provide copies.

WUTC STAFF DATA REQUEST NO. 367: Please provide a detailed history of the use of Bayview Terminal (i.e. when it was placed in service, for what purposes it was used, how that use changed, when and why), and Olympic's plan to bring Bayview Terminal back into a condition in which it will be used for its originally intended purposes. Your response should include the next date when Bayview Terminal will be used for its originally intended purposes, and how Olympic intends to account for the project in the meantime, and why. Provide the documents evidencing Olympic's plan.

WUTC STAFF DATA REQUEST NO. 368: Please state the current status of the Cross-Cascades Project and Olympic's plans with respect to that project. Include in your answer a detailed explanation of how Olympic intends to account for that project before it is placed into service.

WUTC STAFF DATA REQUEST NO. 369: Please state the 2001 actual, and 2002 projected level of management fees paid by Olympic to BP Pipelines and any other related company. Explain what services Olympic did or will receive for its money, how Olympic determined (and will determine) that the payments are cost-effective, and the basis for the 2002 projection.

WUTC STAFF DATA REQUEST NO. 370: Please produce any management contract (other than Ex. 48) that Olympic has now (or had during the test period) with BP Pipelines or any other related company, and state whether such contract was approved by the Commission. If it were not approved, please state Olympic's belief whether or not such approval was required, and the basis for the belief.

WUTC STAFF DATA REQUEST NO. 371: For the period 1996 through 2001 (and projected for 2002), please state how much volume on the pipeline was (will be) covered by throughput and deficiency agreements, and identify which customers had (will have) such agreements. If any significant change is anticipated for periods following 2002, please describe them.

WUTC STAFF DATA REQUEST NO. 372: Produce a typical (and current) throughput and deficiency agreement between Olympic and a shipper currently using the Olympic pipeline.

WUTC STAFF DATA REQUEST NO. 373: Please explain how the throughput and deficiency agreements actually operated with respect to any shipper who had such an agreement, and was not served due to the Whatcom Creek explosion. E.g. did the agreement operate to require the shipper to pay or not to pay?

WUTC STAFF DATA REQUEST NO. 374: Provide monthly Income Statements and Balance Sheets for the year 2001 in the same detail as OPL-31, (CAH-4). Also provide the off book or side record amounts for these financial documents by month for AFUDC, Accelerated Deferred AFUDC, and amortization of AFUDC. Provide any other side records that you use in developing the FERC method of ratemaking. Provide all supporting documents, calculations and assumptions used to develop these side records. This information should be in accordance as it was requested during the staff visit of January 17, 2002.

WUTC STAFF DATA REQUEST NO. 375: Provide all supporting documents, calculations and assumptions used to develop the data on Exhibit No. OPL-31 Schedule 14 lines 26 and 32; Inflation Factor and Real Equity Rate of Return. This information should be in accordance as it was requested during the staff visit of January 17, 2002.

WUTC STAFF DATA REQUEST NO. 376: Provide for the twelve months ending December 31, 2001 an update to your Exhibit OPL-31 and all the schedules. This information should be in accordance as it was requested during the staff visit of January 17, 2002.

WUTC STAFF DATA REQUEST NO. 377: Provide a schedule showing total investment, accumulated depreciation, and net investment in Bayview Terminal at December 31, 2001. Use this information to adjust the results of the prior DR removing Bayview's investment, expenses etc. from all appropriate schedules. This adjustment will be similar to the adjustment the

Company made in OPL-31, CAH-4 for Sea-Tac. This information should be in accordance as it was requested during the staff visit of January 17, 2002.

WUTC STAFF DATA REQUEST NO. 378: Provide a schedule adjusting the FERC-based revenue requirement, operating results, and rate base shown in OPL-31, CAH-4, to traditional WUTC return on net depreciated rate base. This information should be in accordance as it was requested during the staff visit of January 17, 2002.

WUTC STAFF DATA REQUEST NO. 379: Provide monthly Income Statements and Balance Sheets for the year 2001 based on Olympic's actual ledgers.

WUTC STAFF DATA REQUEST NO. 380: Provide an analysis comparing how Olympic's actual operating results in 2001 compared with relevant fixed bid amounts for the same time period.

WUTC STAFF DATA REQUEST NO. 381: Provide an explanation of all variances of prepayments and oil inventories appearing in the final column of Schedule 17 of OPL-31, CAH-4.

WUTC STAFF DATA REQUEST NO. 382: Provide documentation, support, and explanation for all Public Relation expenses included in Casualty Loss in OPL-31, CAH-4. This information should be in accordance as it was requested during the staff audit January 17, 2002.

WUTC STAFF DATA REQUEST NO. 383: Provide a calculation for the current and deferred income taxes, reflecting regulatory adjustments for the amortization of AFUDC and amortization of deferred return, for the twelve month period ending December 31, 2001. (Revised Data Request No. 320). This information should be in accordance as it was requested during the staff visit of January 17, 2002.

WUTC STAFF DATA REQUEST NO. 384: Please produce any analysis possessed by Olympic Pipe Line or any of its witnesses in this case, that addresses in any way the competitive alternatives to Olympic's pipeline transportation, including any price comparisons between Olympic's services and the services of any alleged alternatives. Any such documents already filed as a part of Mr. Schink's direct evidence need not be produced separately.

WUTC STAFF DATA REQUEST NO. 385: When will Olympic be paying its WUTC regulatory fee, which was due May 1, 2001?

WUTC STAFF DATA REQUEST NO. 386: When will Olympic be filing its annual report for 2000 with the WUTC, which was due May 1, 200?

WUTC STAFF DATA REQUEST NO. 387: Provide a schedule summarizing the costs associated with the conversion of your accounting system from ISP to SAP in May, 2001. Also show how much was charged by month and by account in your financial ledgers.

WUTC STAFF DATA REQUEST NO. 388: Provide the information supplied in response to Staff Data Request 310 in Schedule 310.1 as s10.2 for power supply in the same manner and format previously supplied by you in response to Staff Data Request 25, Schedules 25.1 and 25.2. Include also data for December 2001, if it is now available.

WUTC STAFF DATA REQUEST NO. 389: Provide all calculations, supporting documentation, and assumptions used in the development of the August, 2001, 0.08607744 c/Bbl power cost that was used to proform power costs up to present levels.

WUTC STAFF DATA REQUEST NO. 390: Provide a schedule summarizing the costs associated with the conversion of your accounting system from ISP to SAP in May, 2001. Also provide how much was charged by month and by account in your financial ledgers.

WUTC STAFF DATA REQUEST NO. 391: Provide the information supplied in response to Staff Data Request 310 in Schedule 310.1 and 310.2 for power supply in the same manner and format previously supplied by you in response to Staff Data Request 25, Schedules 25.1 and 25.2. Include also data from December, 2001, if it is now available.

WUTC STAFF DATA REQUEST NO. 392: Please clarify if Olympic is relying on the .08851425 c/bbl in the final column of Sched. 309B or the .08607744 c/bbl in the last row of the second column of Sched. 309B. Provide all calculations, supporting documentation, and assumptions for whichever one was used to proform power costs up to present levels in Schedule 309(B), which in turn relates to the test period fuel and power amount of \$9,373,454 on Line 1 of Sched. 21.6 and Line 14 of Sched. 22.7 of OPL-31, CAH-4.

WUTC STAFF DATA REQUEST NO. 393: It appears from the Port of Seattle utility/power information shown on pages 11 and 12 of Sched. 312, that the \$72,728 total amount on page 12 is only 6 months of information for your Sea-Tac facility during the period August – December, 2000. Is this the same \$72,729 that appears at Line 2 of Sched. 21.6 in OPL-31, CAH-4? Please reconcile the \$72,729 amount with the \$182,013 appearing on Line 9, Sched. 22.7, OPL-31, CAH-4.

WUTC STAFF DATA REQUEST NO. 394: Please confirm that the asset account balances and \$499,186 expense information contained in your responses to DRs 30 and 312 involve Olympic's total operations at Sea-Tac Airport, not just the tank farm/terminal or the new truck rack.

WUTC STAFF DATA REQUEST NO. 395: Please provide documentation from Marsh Insurance Agency or other insurance provider supporting the Insurance Expense information supplied in Sched. 315.

WUTC STAFF DATA REQUEST NO. 396: Please provide a schedule showing the details of all prepaid insurance booked in the year 2001 included in Rate Base as Working Capital.

WUTC STAFF DATA REQUEST NO. 397: Staff's understanding of the \$9,316,881 total of Outside Services per Sched. 21, OPL-31, CAH-4, and the detail supplied in Sched. 21.5 is as follows: \$1,048,000 BP Administration Fee, \$5,615,000 One Time Maintenance, \$1,194,000 Amtz. of Remediation Accrual, and \$455,047 Amtz. of Operator Transition Costs for a total of \$8,312,047. Please explain the \$1,004,834 difference between the \$8,312,047 figure and the above-mentioned \$9,316,881 figure.

WUTC STAFF DATA REQUEST NO. 398: Please confirm that of the \$6,452,000 Remediation Accrual approved by Olympic's Board of Directors at their meeting of December 13, 2000, that per the provisions of Exhibit 1 of the minutes of that meeting, \$2,566,000 related to the Whatcom Creek incident.

WUTC STAFF DATA REQUEST NO. 399: Please confirm that the \$1,194,000 amortization amount of the December, 2000 Remediation Accrual on Lines 12 – 15 of Sched. 21.5, OPL-31, CAH-4 is a 2001 Budget Amount.

WUTC STAFF DATA REQUEST NO. 400: Of the \$1.3 million cost to move Olympic annuitants into the BP plan approved by the Board of Directors at their March 13, 2001 meeting, please give the monthly amounts by account that have since been recorded into Olympic's financial ledgers.

WUTC STAFF DATA REQUEST NO. 401: Please provide a listing by year, by account, of all Government and Public Relations-related expenses identifying categories and amounts since mid-2000 relating to Olympic's Government and Public Affairs activities. Please confirm that the only portion recorded by the company in any expense other than Whatcom related amounts in the Casualty Loss account, is Dan Cummings' payroll and related amounts recorded in the Salaries and Wages accounts. Please give the details of Mr. Cummings related amounts, by account, by month since August 1, 2000, forward.

WUTC STAFF DATA REQUEST NO. 402: For the years 1983 to the present, prepare a schedule of Olympic's actual rate of return achieved. Show revenues, expenses, taxes, and all components of the rate base using historical costs less depreciation.

WUTC STAFF DATA REQUEST NO. 403: Please provide a revised Sched. 303.2, as if the April corrected amounts in the property accounts had been recorded correctly in the first place, including revising the beginning December, 2000 amounts as necessary. Using the information thus compiled, prepare a depreciation schedule for calendar year 2001, for each major asset group as depicted in FERC Form 6, showing beginning balances, changes for the year, ending balances, and depreciation expense. For December 2001 transfers from CWIP to Plant in Service, show each project separately, the date the asset was actually placed in service, 2001 depreciation expense by month, and the ending accumulated depreciation reserve.