

EXHIBIT D

Compilation of FERC Staff's Data Requests before the FERC

**Olympic Pipe Line Company
Docket No. IS01-441-000
Commission Staff's First Data Request of Olympic**

**January 16, 2002
Cost Allocation and Rate Design**

Please provide the following information regarding Olympic Pipe Line Company (Olympic):

Staff/Olympic 1:

Please provide a large-scale geographic map of Olympic's entire pipeline system.

Staff/Olympic 2:

Please provide a large-scale schematic diagram of Olympic's entire pipeline system showing all origin and destination points, the mileages between all points, direction of flow of the lines, bi-directional lines, diameters of pipe, all line segments, and the capacities of each line in barrels per day.

Staff/Olympic 3:

Please provide a narrative history of the pipeline from its inception to the present day. In the explanation please provide the following:

- a. an explanation of the corporate history of the pipeline including the dates of the ownership changes of the pipeline;
- b. an explanation of all expansions of the pipeline including dates of construction, cost of the expansions, and capacity increases;
- c. dates when new origin and destination points were added, and connections with new pipelines;
- d. dates when new services were added;

- e. an explanation of the dates and circumstances when any part of the pipeline or a particular line segment was not operational or not in use or taken out of service.

Staff/Olympic 4:

Please describe all non-carrier activities operated by Olympic. For each non-carrier service please list on a yearly basis the service performed and the amount of non-carrier revenue, related volumes if applicable for the years 1995 through 2001.

Staff/Olympic 5:

Please provide copies of Olympic's FERC Annual Form 6 for each year since 1983.

Staff/Olympic 6:

Please provide a complete explanation of Olympic's terminal operations and describe all services performed at the terminals.

Staff/Olympic 7:

Please provide schedules of monthly throughput, by origin and destination pairs, by tariff, product type, for each calendar year from the 1995 through 2001. Please include and indicate intrastate and interstate volumes.

Staff/Olympic 8:

Please provide the overall capacity utilization percentages of the pipeline from 1995 through 2001.

Olympic 9:

Please provide the revenues and volumes per terminal for terminal operations for each calendar year from the 1995 through 2001, state whether the revenues and volumes are considered interstate or intrastate in nature and/or carrier or non-carrier revenues.

Staff/Olympic 10:

Please provide all studies that Olympic or its predecessors and/or affiliates have performed or contracted for related to throughput on Olympic's system.

Staff/Olympic 11:

Please provide a copy of Olympic's most current proration policy.

Staff/Olympic 12:

Mr. Robert Batch states in his Direct Testimony, Page 18, that Olympic has been constrained, and therefore prorated, for at least ten years prior to the Whatcom Creek incident. Please provide the following information:

- a) Please identify each line of Olympic's system that was under proration, the percentage of proration, and the period of proration,
- b) Please provide copies of all shipper correspondence relating to Olympic's proration policy for the years 1995 through 2001,
- c) Please provide copies of all shipper correspondence relating to requests for transportation on Olympic's system and requests for new transportation services from 1995 through 2001, if such requests related to prorating periods or segments.

Staff/Olympic 13:

Please provide a copy of all tariffs in effect from 1995 through 2001.

Staff/Olympic 14:

Please provide a chart listing all of Olympic's tariff rates and designate each rate which Olympic considers a grandfathered rate and provide what Olympic considers the economic circumstances and basis of each grandfathered rate on its system. In addition, please designate which rates Olympic considers non-grandfathered rates and the reason(s).

Staff/Olympic 15:

Please provide an electronic version of the cost of service calculations shown in Exhibit No. OPL-30 and OPL-31.

Staff/Olympic 16:

Please furnish Olympic's total Operation and Maintenance (O&M) Expenses and Administrative and General Expenses (A&G) by month and by account for the period January 1, 1999 through December 31, 2001.

Staff/Olympic 17:

Provide a list of Olympic's parent companies' employees who were assigned to do work for Olympic. How was their time charged to Olympic? Provide documentation. For allocated time, describe the method of allocation and coordinate that with Olympic Corporation's method of allocating corporate overhead.

Staff/Olympic 18:

Does Olympic have any contracts with its affiliates for any services billed, allocated, or expensed to its affiliates? If so, please provide copies of the contracts and an explanation of the services. Also, please answer this question with regard to Olympic's previous owners.

Staff/Olympic 19:

What accounting methods do Olympic and its affiliates use to track intercompany and shared service costs? What accounting reports do they generate for management to show the intercompany and shared services cost? Please provide copies.

Staff/Olympic 20:

Please provide a schedule showing the following information:

- a. The gross costs (pre-allocated) incurred by Olympic's parent or allocated companies that are allocated to Olympic and other subsidiaries,
- b. The amounts allocated (indicate the recipient company),
- c. The type of service (the nature/description of the charge), and
- d. The FERC account affected.

Staff/Olympic 21:

Please provide a detailed schedule showing the company's methodology for allocating costs to and from subsidiary and/or affiliated companies by month for the period January 1, 1999 through December 31, 2001. The schedule should show the following information:

- a. Type of system-wide service rendered by or for Olympic or its affiliates,

- b. Total pre-allocated cost and total allocated cost in providing this service (show breakdown of materials, labor and overhead, etc.),
- c. Amounts in (B) that are directly charged to and/or allocated to other companies,
- d. Allocation factors and/or basis used to allocate the amounts in (C),
- e. Amounts allocated (indicate the recipient company),
- f. The FERC account affected, and
- g. The gross revenue less cost of good sold, direct labor and gross plant for Olympic, Olympic Corporation, Olympic Company, and for all affiliated companies.

Staff/Olympic 22:

Break out all environmental costs by FERC Account and by assessment, monitoring, administrative, and actual cleanup costs for the years for the period January 1, 1999 through December 31, 2001.

Staff/Olympic 23:

Please provide complete workpapers supporting the cost of service for each year 1999 through 2000, inclusively, as shown in Olympic' Form 6, page 700. Please provide the electronic versions of each cost of service.

Staff/Olympic 24:

Has either an internal or independent audit been conducted of Olympic' operations during the past 3 years? If so, please provide a copy of the audit. If an audit has not been conducted, but is scheduled, please indicate the date it is scheduled and the name of the auditor.

Staff/Olympic 25:

Please explain how Olympic allocates interstate and intrastate costs on its system. Please state if Olympic uses a separations directory. If so, please provide copies of the directory for all years that Olympic has used the directory.

Staff/Olympic 26:

Referring to Cynthia Hammer's direct testimony, Exhibit OPL-27, page 7, lines 17-21, please provide a copy of the referenced letter of understanding regarding the expected sale of the SeaTac terminal.