Docket No. UE-141335

Petitioners' Exhibit List

Witness: Jennifer A. Boyer

Tab

1. PSE's Response to Petitioner's Data Request No. 008
2. PSE's Response to WUTC Staff Data Request No. 019
3. PSE's Response to WUTC Staff Data Request No. 021
4. PSE's Response to WUTC Staff Data Request No. 023
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8. PSE's Response to WUTC Staff Data Request No. 037

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UE-141335
Puget Sound Energy, Inc.'s
Petition for Declaratory Order of King County et al.
Regarding Maloney Ridge Line

PETITIONERS DATA REQUEST NO. 008

PETITIONERS DATA REQUEST NO. 008:

Concerning Puget's service area and its planning for its distribution system, please answer the following:

A. Does Puget have service territory in urban areas and non-urban areas? Please explain.

B. To the extent Puget has customers in urban areas, please estimate the cost of distribution line installation (by voltage level), operation and maintenance (by voltage level) for subtransmission voltage circuits and primary voltage circuits.

C. Provide the same information and estimated cost of installing, maintaining and replacing equipment for distribution service starting at primary voltage circuits up through subtransmission voltage circuits in non-urban service territories.

D. Please identify Puget's differential in pricing for distribution service if the service is provided to a customer in an urban part of Puget's service territory, or a non-urban part of the Puget's service territory.

Response:

A. Puget Sound Energy, Inc. ("PSE") does have service territory in urban areas and non-urban areas, however PSE does not define its service area by urban and non-urban, nor does it have specific definitions as to whether an area is urban or non-urban.

B.-C. PSE's typical distribution voltage is 12.5kV. Costs for a distribution line installation can vary based on a number of factors including type of construction (overhead or underground), single phase versus three-phase, site conditions, permitting requirements, real estate requirements (easements), and restoration. PSE estimates an average of $150 per foot for underground and $100 per foot for overhead distribution facilities; however actual costs can vary significantly based on the above listed factors.

The annual operating and maintenance cost for a distribution line is defined in Schedule 62 of PSE's electric tariff and is based on the installed cost per mile and length of the line. Schedule 62 is for leased facilities; however, the operation and maintenance cost of all lines is the same.

D. There is no price differential for the distribution services provided to a customer in urban or non-urban part of PSE's service territory.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UE-141335
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Regarding Maloney Ridge Line

WUTC STAFF DATA REQUEST NO. 019

WUTC STAFF DATA REQUEST NO. 019:

Safety, Reliability, and Technical Issues

Please provide all documents related to loss of service and the actions taken by PSE to repair the Maloney Ridge Line or to restore service to the Maloney Ridge customers since 1971.[1]

Response:

Attached as Attachment A to Puget Sound Energy, Inc.'s ("PSE") Response to WUTC Staff Data Request No. 019, please find an MS Excel spreadsheet, which provides dates of loss of service and duration times to repair and restore service related to loss of service of the Maloney Ridge Line.

PSE's current loss of service records for the Maloney Ridge Line only go back to 1990.

[1] Petition ¶27.

ATTACHMENT A to PSE's Response to WUTC STAFF Data Request No. 019

Cable #	Footage	Date	Year	I-#	WO#	Notification	Duration (hrs)	Root Cause
33550		9/27/2007	2007	9152	594055313	E883340110	13.13	Cable Failure
		1/14/2008	2008	9191	594057446	E054047094	35.18	Cable Failure
Size	1000	8/4/2008	2008	4594			14.55	Cable Failure
		4/8/2013	2013	2869	594090959	P00003129-1	19.47	Cable Failure
		8/27/2013	2013	31804	594092783	P00031804-1	10.8	Cable Failure
		9/14/2013	2013	36130	594093043	P00036130-1	6.37	Cable Failure
38338		6/20/1995	1995					Cable Failure
		2/15/2002	2002	8942	594013034	E327643417	9.12	Cable Failure
Size	4500	10/12/2006	2006	5846	594048049	E105618402	21.97	Cable Failure
		10/21/2009	2009	9462	101060241	10908220	28.72	Cable Failure
33549		7/24/1993	1993					Cable Failure
		7/28/2003	2003	1055	594023032	E445018896	17.15	Cable Failure
Size	4752	9/30/2005	2005	4728	594040390	E201640805	14.25	Cable Failure
		8/8/2006	2006	1806	594046609	E487493112	11.30	Cable Failure
		1/20/2007	2007	1901	594050030	E239233983	27.17	Cable Failure
		8/28/2007	2007	7322	594054618	E339018017	13.58	Cable Failure
		10/10/2007	2007	1183	594055459	10771162	14.08	Cable Failure
		10/20/2008	2008	2971	594062797	E664355948	18.50	Cable Failure
		9/5/2009	2009	5331	594068552	E791665731	13.18	Cable Failure
		7/2/2010	2010	6143	594073936	E334511677	8.25	Cable Elbow
		9/30/2010	2010	4504	594075730	E236070487	13.12	Cable Failure
		2/24/2011	2011	9816	594078306	E423593012	66.72	Cable Failure
		7/25/2012	2012	5107	594087616	E443592875	8.48	Cable Failure
		8/8/2012	2012	6066	594087900	E099526743	14.18	Cable Failure
		8/18/2012	2012	6691	594088086	E547486631	17.40	Cable Failure
		8/19/2012	2012	6751	594088112	E276527234	12.80	Cable Failure
		9/21/2012	2012	8594	594088752	E118739457	11.40	Cable Failure
		10/14/2013	2013	46905	594093534	P00046905-1	9.41	Cable Failure
33548		9/5/1991	1991					Cable Failure
		6/27/1997	1997					Cable Failure
Size	5300	8/27/2001	2001	3610	594011277	10445839	13.23	Cable Failure
		10/25/2003	2003	7042	594025109	E938815040	13.17	Cable Failure
		8/11/2003	2003	1852	594023391	E698248748	10.48	Cable Failure
		7/10/2004	2004	4013	594030120	E441211763	49.58	Cable Failure
		7/27/2004	2004	5067	594030526	E632482856	10.12	Cable Failure
		8/20/2004	2004	6626	594031201	E467705346	10.37	Cable Failure
		10/4/2005	2005	5000	594040402	E302804379	11.65	Cable Failure
		7/14/2007	2007	4068	594053520	E895934706	14.45	Cable Failure
		6/8/2009	2009	6223	594066705	E010938074	21.87	Cable Failure
		7/20/2010	2010	7591	594074266	E410151121	8.73	Cable Failure
		8/10/2010	2010	9344	594074669	E669459896	13.30	Cable Failure
		9/21/2010	2010	3787	594075530	E099084679	13.13	Cable Failure
		7/11/2011	2011	9892	594080853	E442860128	9.12	Cable Failure
		2/23/2012	2012	4282	594084916	E266192939	20.28	Cable Failure
		7/24/2012	2012	5047	594087613	E814758599	14.73	Cable Failure

Cable #	Footage	Date	Year	I-#	WO#	Notification	Duration (hrs)	Root Cause
		8/17/2012	2012	6656	594088044	E864902240	11.22	Cable Failure
		9/20/2012	2012	8543	594088640	E622403730	12.67	Cable Failure
		10/7/2012	2012	9414	594088844	E381498539	11.43	Cable Failure
		7/21/2013	2013	24580	594092215	P00024580-1	16.77	Cable Failure
		8/17/2013	2013	29773	594092632	P00029773-1	8.78	Cable Failure
		8/21/2013	2013	30521	594092695	P00030521-1	11.92	Cable Failure
		11/15/2013	2013	59223	594094007	P00059223-1	29.30	Cable Failure
		4/24/2014	2014	90439	594095875	P00090439-1	8.85	Cable Failure
		7/3/2014	2014	100772	594096952	P00100772-1	14.75	Cable Failure
33547		8/11/2001	2001	2505	594011061	E044890532	40.50	Cable Failure
		9/14/2001	2001	4584	594011515	E926118688	11.55	Cable Failure
Size	6336	8/29/2002	2002	1147	594016085	E497448316	17.92	Cable Failure
		6/14/2003	2003	7365	594021945	E881654699	5.82	Cable Failure
		9/21/2003	2003	4268	594024255	E896936584	17.27	Cable Failure
		12/7/2003	2003		storm order	E596780038		Cable Failure
		7/12/2004	2004	4202	594030201	E667464810	21.80	Cable Failure
		6/30/2005	2005	7392	594038058	E863774093	11.67	Cable Failure
		10/2/2005	2005	4807	594040418	E431567957	13.88	Cable Failure
		9/10/2006	2006	3968	594047323	E558847633	32.48	Cable Failure
		7/29/2007	2007	5233	594053841	E537773141	34.17	Cable Failure
		7/31/2007	2007	5402	594053930	E769730031	12.90	Cable Failure
		11/6/2008	2008	4460	594063133	E503277808	21.90	Cable Failure
		11/14/2008	2008	5390	594063296	E784768763	10.77	Cable Failure
		6/20/2009	2009	7349	594066908	E642321030	9.38	Cable Failure
		8/6/2009	2009	2807	594067897	E038295589	15.27	Cable Failure
		7/31/2010	2010	8486	594074425	E237521346	10.38	Cable Failure
		9/26/2010	2010	4240	594075613	E360004566	8.60	Cable Failure
		10/7/2010	2010	4897	594075832	E411980496	14.00	Cable Failure
		10/10/2010	2010	5125	594075857	E974228459	13.30	Cable Failure
		5/11/2011	2011	6004	594079682	E597428293	13.63	Cable Failure
		5/27/2011	2011	7050	594080035	E370470395	11.65	Cable Failure
		7/3/2011	2011	9380	594080725	E224625034	11.67	Cable Failure
		10/3/2011	2011	7188	594082448	E647118515	14.33	Cable Failure
		10/18/2011	2011	8211	594082703	E779007817	7.12	Cable Failure
		11/4/2011	2011	9378	594083076	E764496700	8.53	Cable Failure
		7/19/2012	2012	4620	594087473	E189487045	12.58	Cable Failure
		7/31/2012	2012	5429	594087768	E221745666	19.35	Cable Failure
		8/20/2012	2012	6819	594088137	E018522829	10.50	Cable Failure
		8/24/2012	2012	7042	594088213	E938815040	13.17	Cable Failure
		8/4/2013	2013	27263	594092434	P00027263-1	6.95	Cable Failure
		8/19/2013	2013	29982	594092639	P00029982-1	6.5	Cable Failure
		9/10/2013	2013	35327	594093025	P00035327-1	13.68	Cable Failure
		9/20/2013	2013	37161	594093096	P00037161-1	12.78	Cable Failure
		11/14/2013	2013	58726	594093937	P00058726-1	13.63	Cable Failure
		11/19/2013	2013	59833	594094087	P00059833-1	13	Cable Failure
		6/18/2014	2014	98299	594096623	P00098299-1	10	Cable Failure
		7/20/2014	2014	103284	594097245	P00103284-1	12.12	Cable Failure
		7/23/2014	2014	103848	594097262	P00103848-1	10.67	Cable Failure

Cable #	Footage	Date	Year	I-#	WO#	Notification	Duration (hrs)	Root Cause
		7/26/2014	2014	104424	594097302	P00104424-1	34.27	Cable Failure
		9/17/2014	2014	112950	594098177	P00112950-1	14.25	Cable Failure
33546		7/11/1998	1998					Cable Failure
		7/13/1998	1998					Cable Failure
Size	5800	8/20/2001	2001	2971	594011168	E641421104	13.1	Cable Failure
		9/11/2001	2001	4457	594011490	E974987952	14.58	Cable Failure
		12/11/2001	2001	5504	594012473	E148358063	17.12	Cable Failure
		8/16/2002	2002	9457	594015834	E945038331	11.63	Cable Failure
		6/12/2003	2003	7287	594021919	E484742230	24.25	Cable Failure
		10/6/2003	2003	5059	594024684	E890267978	11.45	Cable Failure
		7/12/2006	2006	8789	594045914	E417915767	10.67	Cable Failure
		7/1/2008	2008	2026	594060389	E404026075	14.8	Cable Failure
		7/23/2009	2009	1330	594067674	10896149	9.38	Cable Failure
		8/11/2009	2009	3288	594068036	E069506421	10.68	Cable Failure
		8/20/2009	2009	4155	594068139	E498331002	10.13	Cable Failure
		8/26/2009	2009	4533	594068626	10900556	6.15	Cable Failure
		2/21/2010	2010	4049	594071694	E959731613	12.13	Cable Failure
		2/28/2010	2010	4535	594071804	E923899550	19.23	Cable Failure
		3/1/2010	2010	4618	594071853	E029789339	12.4	Cable Failure
		7/22/2010	2010	7842	594074312	E395167498	10.6	Cable Failure
		9/2/2010	2010	2393	594075168	10968990	8.33	Cable Failure
		9/11/2010	2010	2995	594075249	E356723930	9.77	Cable Failure
		10/18/2010	2010	5665	594076014	E250007869	12.43	Cable Failure
		3/8/2011	2011	1935	594078504	E480347739	35.85	Cable Failure
		7/5/2011	2011	9467	594080723	E082518312	8.35	Cable Failure
		7/16/2011	2011	1331	594080906	E569874898	12.9	Cable Failure
		11/13/2011	2011	1083	594083253	E019070336	11.28	Cable Failure
		3/20/2012	2012	6242	594085304	E364472896	12.46	Cable Elbow
		7/16/2012	2012	4422	594087431	E355308389	18.63	Cable Failure
		8/18/2012	2012	6691	594088086	E547486631	17.4	Cable Failure
		7/20/2013	2013	24473	594092206	P00024473-1	14.62	Cable Failure
		8/3/2013	2013	27199	594092427	P00027199-1	8.2	Cable Failure
		9/28/2013	2013	38766	593139463	P00038766-1	37.32	Cable Failure
		7/25/2014	2014	104077	594097289	P00104077-1	10.72	Cable Failure
33390		5/1/1996	1996					Cable Failure
		3/23/2000	2000	1600		10407461	2.3	Cable Failure
Size	2112	6/1/2000	2000			10414859		Cable Failure
		1/30/2004	2004	5937	594026866	E107623222	10.8	Cable Failure
8046		1/24/2002	2002	7974	594012830	E988905385	14.43	Cable Failure
		7/15/2009	2009	9623	594067447	10895149	13.47	Cable Failure
Size	1584	7/16/2012	2012	4422	594087431	E355308389	18.63	Junction Box
33544		7/27/1996	1996					Cable Failure

Cable #	Footage	Date	Year	I-#	WO#	Notification	Duration (hrs)	Root Cause
Size	6336	6/11/2003	2003	7235	594021913	E057028094	17.8	Cable Failure
		7/9/2008	2008	2708	594060612	E303449303	13.57	Cable Failure
		5/16/2012	2012	9439	594086245	E844793340	8.8	Cable Failure
		10/11/2012	2012	9642	594088897	E487111862	9.53	Cable Failure
		7/28/2013	2013	25969	594092280	P00025969-1	11.63	Cable Failure
		9/16/2013	2013	36423	594093087	P00036423-1	10.5	Cable Failure
		7/22/2014	2014	103540	594097237	P00103540-1	11.3	Cable Failure
		9/18/2014	2014	113140	594098183	P00113140-1	10.9	Cable Failure

33545		7/30/1990	1990					Cable Failure
		4/6/2005	2005	1990	594036041	E474284572	20.9	Cable Failure
Size	5808	10/8/2009	2009	7958	594069305	E485013419	12.18	Cable Failure
		2/27/2010	2010	4535	594071804	E923899550	19.24	Cable Elbow
		7/2/2011	2011	9320	594080699	E208511664	14.43	Cable Failure
		9/19/2013	2013	36946	594093177	P00036946-1	6.67	Cable Failure

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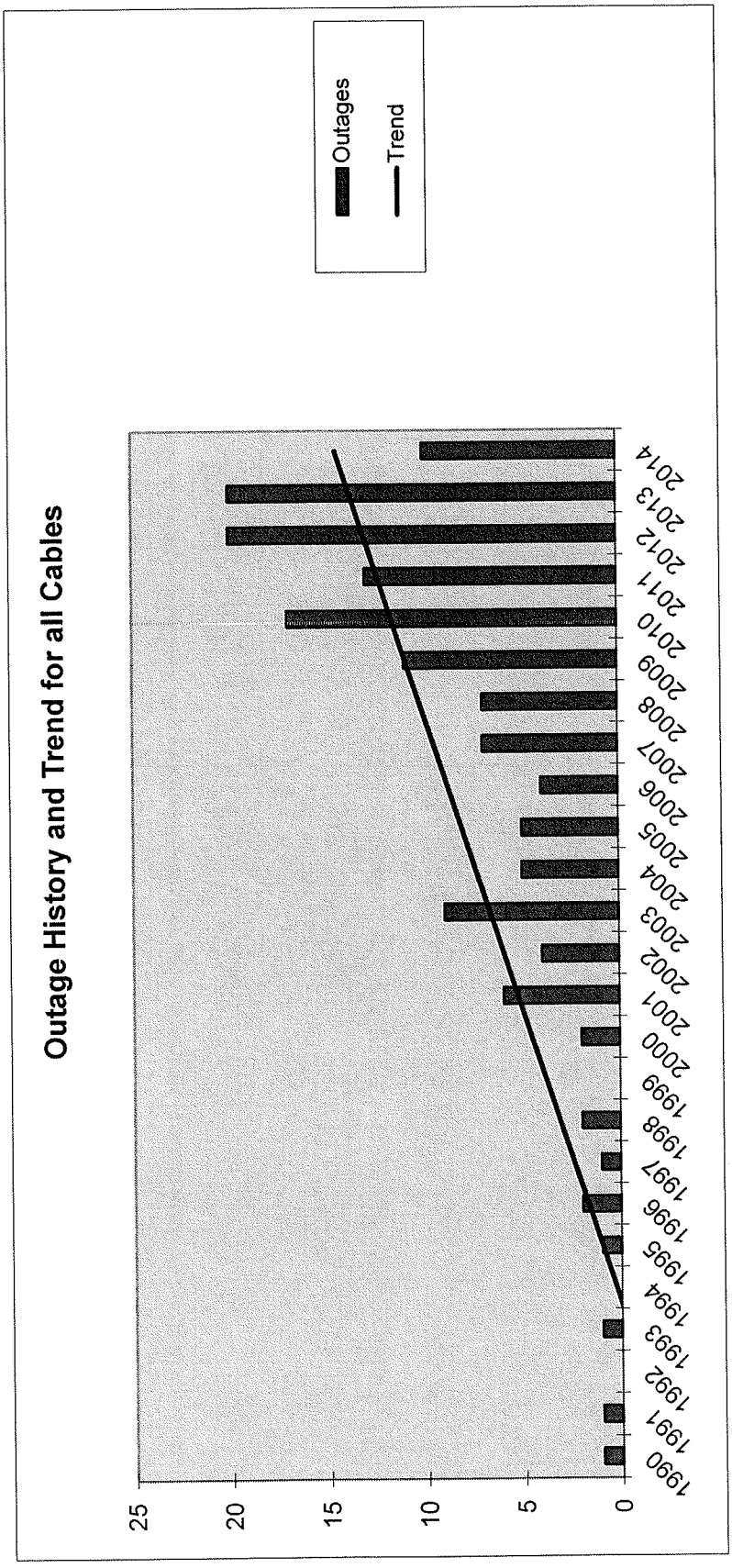
Total Footage 43528
Total footage of worst cables (33546, 47, 48) 17436

:al Outages 149


Outage History and Trend for all Cables
Outages
Trend
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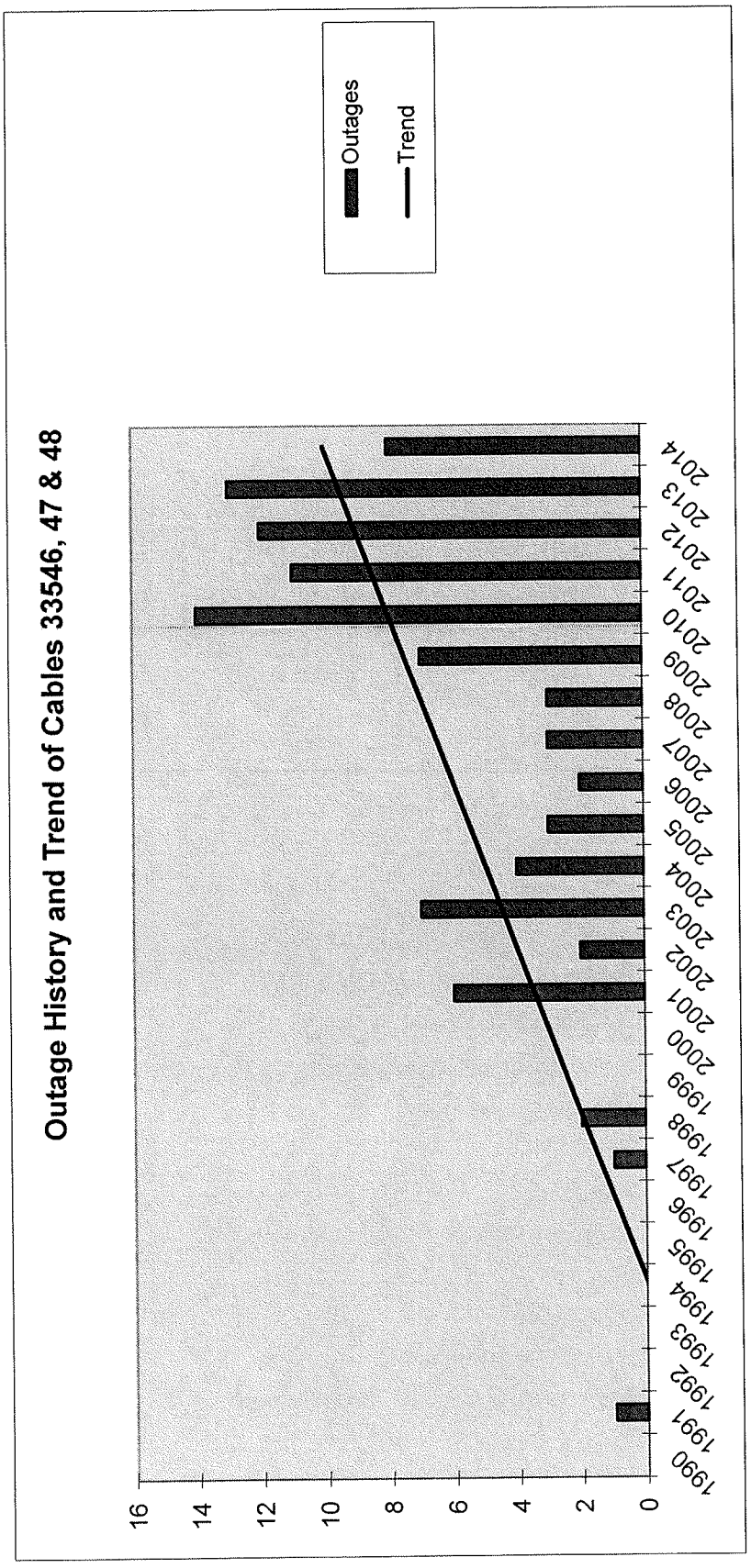
Outage History and Trend of Cables 33546, 47 & 48
Outages
Trend
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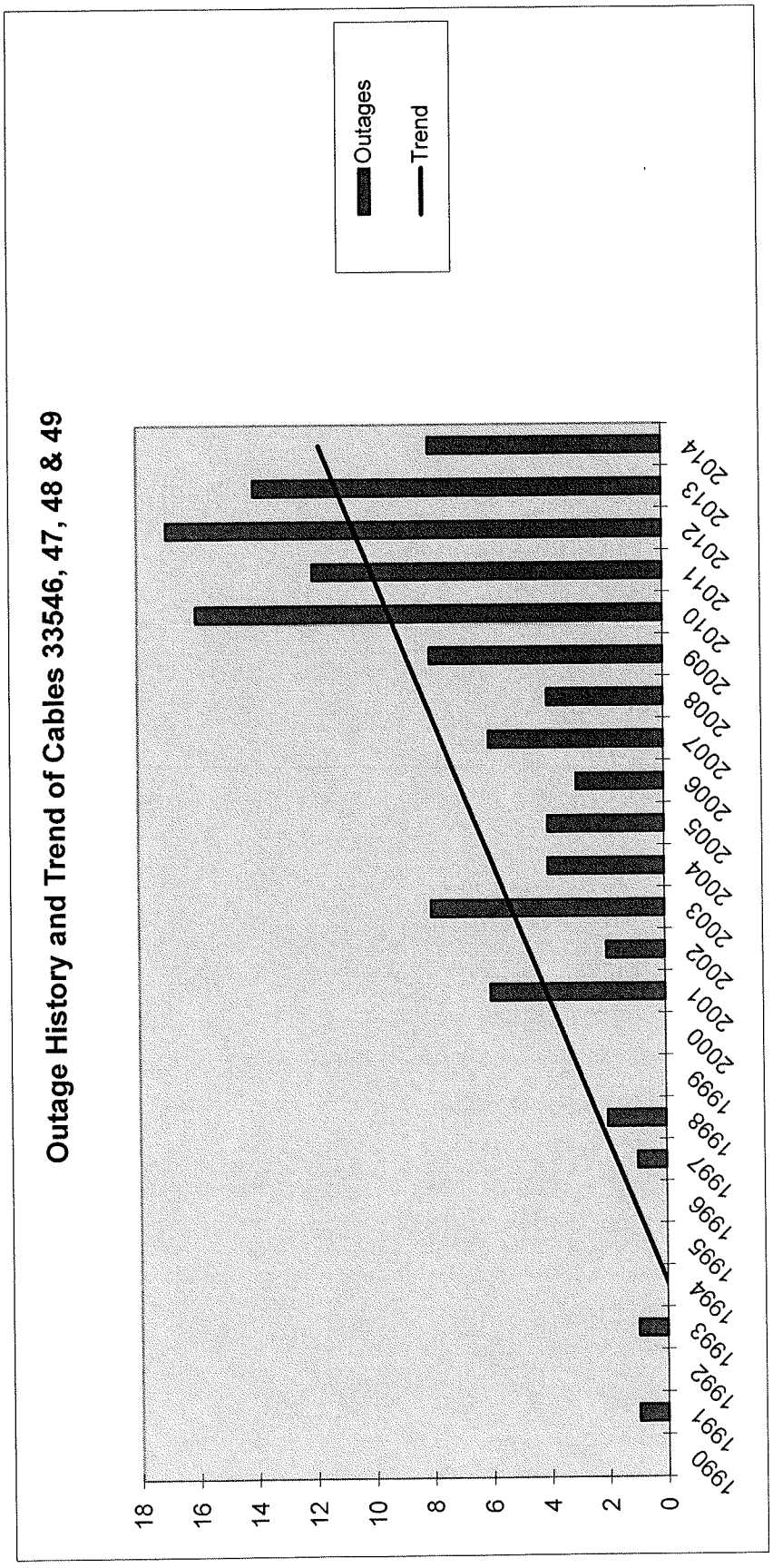
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Outages
Trend
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1999
2000
2001
2002
2003
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014

Outage history for all cables	
Year	Outages by year
1990	1
1991	1
1992	0
1993	1
1994	0
1995	1
1996	2
1997	1
1998	2
1999	0
2000	2
2001	6
2002	4
2003	9
2004	5
2005	5
2006	4
2007	7
2008	7
2009	11
2010	17
2011	13
2012	20
2013	20
2014	10
Total	149

Outage history for cables 33546, 47, & 48	
Year	Outages by year
1990	0
1991	1
1992	0
1993	0
1994	0
1995	0
1996	0
1997	1
1998	2
1999	0
2000	0
2001	6
2002	2
2003	7
2004	4
2005	3
2006	2
2007	3
2008	3
2009	7
2010	14
2011	11
2012	12
2013	13
2014	8
Total	99

Outage history for cables 33546, 47, 48, & 49	
Year	Outages by year
1990	0
1991	1
1992	0
1993	1
1994	0
1995	0
1996	0
1997	1
1998	2
1999	0
2000	0
2001	6
2002	2
2003	8
2004	4
2005	4
2006	3
2007	6
2008	4
2009	8
2010	16
2011	12
2012	17
2013	14
2014	8
Total	117

Cable #	Lengths (ft)[1]
8046	1584
33390	2112
33544	6336
33545	5808
33546	5800
33547	6336
33548	5300
33549	4752
33550	1000
38338	4500[2]
Total	43528

[1] Footages are approximate

[2] Route of cable not along road but direct feed through trees. Footage taken from Google maps based on distance of approximate location of junction box and transformer.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UE-141335
Puget Sound Energy, Inc.'s
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Regarding Maloney Ridge Line

WUTC STAFF DATA REQUEST NO. 021

WUTC STAFF DATA REQUEST NO. 021:

Safety, Reliability, and Technical Issues

What kind of cable and casing is installed underground on the Maloney Ridge Line? Who was the manufacturer? Is there a more reliable type of power line available now?

Response:

The underground cable at the Maloney Ridge Line is a #1/0 stranded conductor with 175 mils of High Molecular Weight Polyethylene ("HMWPE") insulation and jacketed concentric neutral. The underground cable is not installed in casing or conduit. The cable that PSE now installs is a slightly different design due to advancements in cable technology over the last forty years. It features a different insulation compound and is considered more reliable. It is #1/0 solid conductor 175 mils of Tree Resistant Extra Long Polyethylene ("TR-XLPE") insulation and jacketed concentric neutral installed in conduit.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UE-141335
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Regarding Maloney Ridge Line

WUTC STAFF DATA REQUEST NO. 023

WUTC STAFF DATA REQUEST NO. 023:

Safety, Reliability, and Technical Issues

How does the reliability and performance of the Maloney Ridge Line's cable and casings compare with currently available underground cables and casings used for similar underground distribution system applications?

a. In your response, please provide a brief description of modern underground cables and casings, how they differ from the Maloney Ridge Line, and the average expected service life of modern underground installations today.

Response:

Puget Sound Energy, Inc. ("PSE") currently installs #1/0 solid conductor Tree Resistant Extra Long Polyethylene ("TR-XLPE") insulated cable with jacketed concentric neutral in conduit. This material and design performs very well with very few failures. The installations since the change to conduit in 1992 represent less than 3% of the system failures. The main differences from the Maloney Ridge Line is the type of insulation, solid versus stranded conductor, jacketed concentric neutral, and use of conduit. It is difficult to predict the expected service life of modern underground installations; however industry expectation is 2 to 2.5 times the original High Molecular Weight Polyethylene ("HMWPE") cable life.

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Regarding Maloney Ridge Line

WUTC STAFF DATA REQUEST NO. 024

WUTC STAFF DATA REQUEST NO. 024:

Safety, Reliability, and Technical Issues

Can the life of the Maloney Ridge Line be extended by cable injection(s)?

a. If so, please provide a detailed explanation of any technical challenges associated with cable injection(s) on the Maloney Ridge Line and the likelihood of success?
b. Can the cost-effectiveness of such a project be estimated for this line in its current condition?

Response:

a. Provided that a cable meets important criteria, cable Injection is a method of rejuvenating the cable. Current estimates of life extension are 20 to 30 years. There are several technical issues at the Maloney Ridge Line, however, that make cable injection difficult. The major technical difficulties are the lengths of the cables, the number of splices, the elevation gain, and neutral corrosion. The cable sections exceed a mile in length in some locations, which makes it more difficult to inject fluid through that length of cable. The number of splices on the lines from previous failures also makes injection difficult because the older no flow splices would have to be dug up and replaced with splices that allow fluid flow. The elevation gain further provides technical difficulty because it makes it difficult to manage the fluid pressure and could damage fittings. The last technical difficulty is the possibility of neutral corrosion on the line, though none has been noted to date. The concentric neutral is necessary to provide a safe return for the current back to the substation. If there are locations of neutral corrosion this could lead to hot spots and continued failures even after injection.

b. It would be difficult to estimate the cost effectiveness for this project due to the technical hurdles discussed above.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UE-141335
Puget Sound Energy, Inc.'s
Petition for Declaratory Order of King County et al.
Regarding Maloney Ridge Line

WUTC STAFF DATA REQUEST NO. 035

WUTC STAFF DATA REQUEST NO. 035:

Safety, Reliability, and Technical Issues

Please provide the usual safety, reliability, cost-effectiveness, and other criteria and methods that PSE would use to determine the need for and timing of replacement of distribution lines for this tariff class?

Response:

Puget Sound Energy, Inc. ("PSE") would use the same criteria and methods as described in PSE's Response to WUTC Staff Data Request No. 036 for this tariff class. The difference in this case is due to the atypical service agreement that stipulates the customers pay for the operation and maintenance on this line. In other arrangements where the replacement would have an impact in the customer costs, such as leased facilities, we would meet with the customer to explain the issues and only replace with their agreement.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UE-141335
Puget Sound Energy, Inc.'s
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Regarding Maloney Ridge Line

WUTC STAFF DATA REQUEST NO. 036

WUTC STAFF DATA REQUEST NO. 036:

Safety, Reliability, and Technical Issues

Please provide the usual safety, reliability, cost-effectiveness and other criteria and methods that PSE would use to determine the need and timing of replacement of distribution feeder lines, for all parts of PSE's distribution system.

Response:

There are two paths that would lead to replacement of the distribution lines. The first path would be through the Cable Remediation Program. Puget Sound Energy, Inc. ("PSE") reviews every underground outage and scopes a replacement project whenever a cable has a second outage or when there is a third failure within the cable system. The project is added to a master list of possible cable projects. The cable projects are prioritized using criteria such as number and length of outages, customers impacted, cost to replace and proposed in the annual capital budget process. The second path is used infrequently and that would be unplanned replacement due to either a safety issue (for example lack of a solid neutral) or escalating failures that make the replacement financially justified.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UE-141335
Puget Sound Energy, Inc.'s
Petition for Declaratory Order of King County et al.
Regarding Maloney Ridge Line

WUTC STAFF DATA REQUEST NO. 037

WUTC STAFF DATA REQUEST NO. 037:

Safety, Reliability, and Technical Issues

Does PSE have any adopted policy or criteria or methods that would apply differently to the maintenance and replacement of the Maloney Ridge Line, as compared with the usual PSE distribution line replacement criteria? Please provide documentation of any such differences and rationale for the same.

Response:

Puget Sound Energy, Inc. ("PSE") has not adopted any new policy or criteria or methods that would apply differently to the maintenance and replacement of the Maloney Ridge Line, as compared with the usual PSE distribution line replacement criteria. Due to the remoteness and topography of the Maloney Ridge Line cable, PSE does not respond to outages that occur at night during the winter until the next morning for safety reasons. The difference is that due to the economic feasibility, remote location, and small load PSE bills the customers directly for all maintenance and repair costs of the cable under the existing contractual agreement.