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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UG-110723 Tariff Filing for Pipeline Integrity Program

UTC STAFF INFORMAL DATA REQUEST NO. 07:

What are the specific reasons why the Company cannot undertake a proactive approach to integrity improvements on the pipeline system without the PIP tariff?

Response:

The benefit of the PIP tariff is that it allows PSE the ability, in consultation with Commission Staff and others, to accelerate funding for these initiatives beyond the level currently budgeted in any particular year and provides certainty as to the timing of that recovery. PSE believes this accelerated funding is appropriate given the recent pipeline safety issues that have emerged locally and nationally and the age and performance of PSE's system. PSE and Commission Staff will be able to collaborate on a proactive approach to integrity improvements.