BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Puget Sound Energy, Inc.'s 2011 General Rate Case

SIERRA CLUB DATA REQUEST NO. 02.11

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Reference Testimony of Michael L. Jones, page 6, lines 7-9:

- a. During the five-month outage of Unit 4, did PSE make any repairs or capital improvements other than the rotor repairs referenced in Mr. Jones's testimony?
- b. If the answer to (a) is yes, provide an itemized list of each repair or capital improvement, an explanation of the purpose and need for the repair or capital improvement, and the total cost of each repair or capital improvement?
- c. For each repair or capital improvement listed in (b), provide all work orders, studies, or analyses that justify the need for the repair or capital improvement.

Response:

Puget Sound Energy, Inc. ("PSE") objects to Sierra Club Data Request No. 02.11 as overly broad and unduly burdensome with respect to sub-requests (b) and (c). Without waiving such objections, and subject thereto, PSE responds as follows:

- a. Yes, PSE made repairs or capital improvements to Colstrip Unit 4 other than the rotor repairs referenced in the Prefiled Direct Testimony of Michael L. Jones, Exhibit No. ___(MLJ-1CT).
- b. The damage found in 2009 requiring repair of Colstrip Unit 4's turbine rotors was found during an inspection conducted as part of the regular planned triennial maintenance overhaul of Unit 4. During a planned unit overhaul all plant systems and equipment are inspected and regular maintenance and repairs are performed. Inspection, routine maintenance, repair or replacement were conducted on the fuel feed system, pulverizers, boiler, forced draft and induced draft fans, ductwork, scrubbers, steam turbine and generator, boiler feed pumps and mechanical drives, feedwater heaters, condenser, high energy piping, valves, cooling tower and circulating water piping, electrical motors and electrical switchgear and motor control centers.
- c. PSE objects to Sierra Club Data Request No. 02.11 as described above.