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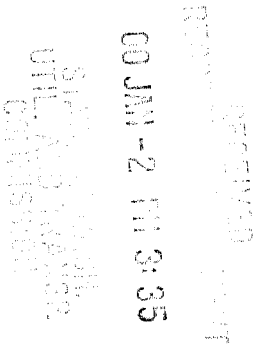

January 2, 2001

HAND-DELIVERED

Office of the Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Attn: Carole J. Washburn

Re: Puget Sound Energy, Inc.'s Petition for Declaratory Order and for Accounting Order and [Proposed] Order

Dear Ms. Washburn:

Enclosed for filing are an original and 19 copies of Petitioner Puget Sound Energy, Inc.'s Petition for Declaratory Order and for Accounting Order, a [Proposed] Order and related exhibits to each document. Also enclosed is a disk containing the above documents and exhibits in electronic form (spreadsheet exhibits are in both ASCII and Excel format).

Please date stamp the enclosed extra copy of this letter and the enclosed documents and return them to our messenger.

Very truly yours,

William R. Maurer

William R. Maurer

Enclosures
cc: Simon ffitch
Fred Ottavelli

[07771-0100/BA003699.438]

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of PUGET SOUND ENERGY, INC. for a Declaratory Order and Accounting Order Regarding the Classification of Certain Facilities and Accounting Treatment Consistent Therewith.	NO. _____ PETITION FOR DECLARATORY ORDER AND FOR ACCOUNTING ORDER

I. INTRODUCTION

A. Parties and Jurisdiction

1. Puget Sound Energy, Inc. ("PSE"), P.O. Box 97034, Bellevue, Washington 98009-9734, hereby petitions the Washington Utilities and Transportation Commission ("Commission") for a declaratory order adopting PSE's proposed classification of transmission and distribution facilities and for an accounting order authorizing PSE to reflect such classifications in its accounts.

2. The following rules or statutes may be brought into issue by this Petition: RCW 34.05.240 (concerning issuance of declaratory orders); RCW 80.01.040(3) (concerning the Commission's jurisdiction to regulate electrical companies); RCW 80.04.090 (authorizing

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the Commission to prescribe the form of accounts); WAC 480-09-230 (concerning issuance of declaratory orders); and WAC 480-100-031 (concerning accounting requirements).

3. PSE's proposed classification of transmission and distribution facilities, and the corresponding accounting treatment of such classifications in PSE's accounts, is an essential component to the demarcation of the boundaries of this Commission's jurisdiction and that of the Federal Energy Regulatory Commission ("FERC"). Such classifications serve the public interest by promoting greater certainty in regulation, and by avoiding regulatory conflicts. As to the Commission's determination of its jurisdiction over local distribution facilities (i.e., facilities other than facilities used in transmitting electric power in interstate commerce), FERC has stated:

> [W]e intend to provide *broad deference to states in determining what facilities are Commission-jurisdictional transmission facilities and what facilities are state-jurisdictional local distribution facilities*, so long as our comparability principles are not compromised and we are able to fulfill our responsibilities under the statute.

Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities, F.E.R.C. Stats. & Regs. ¶ 31,048, at 30,345 (1997) (emphasis added) ("Order 888-A").

II. SUMMARY OF PETITION

4. PSE is a public service company engaged in the generation, transmission, distribution and sale at retail of electric energy in the State of Washington. As such, certain actions of PSE are subject to the authority of the Commission to regulate the same, in the public interest, pursuant to RCW 80.01.040 and other applicable public service laws.

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5. FERC regulates facilities used by PSE in transmitting electric energy in interstate commerce, pursuant to applicable provisions of the Federal Power Act. See FPA § 201; 16 U.S.C. §824.

6. FERC has, from time to time, issued orders that bear upon the lines of demarcation between its regulatory authority and that of the state. See Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities, F.E.R.C. Stats. & Regs. ¶ 31,036, at 31,770 (1996) ("Order 888"). In Order 888, FERC acknowledged, among other things, that states have jurisdiction over local distribution facilities while the federal government exercises jurisdiction over the rates, terms and conditions of unbundled retail transmission in interstate commerce by public utilities.

7. The classification of transmission and distribution facilities for various regulatory purposes may lead to uncertainty and potential conflicts regarding the boundaries of federal/state jurisdiction. To avoid these issues and concerns, FERC has held:

> As a means of facilitating jurisdictional line-drawing, we will entertain proposals by public utilities, filed under section 205 of the FPA, containing classifications and/or cost allocations for transmission and local distribution facilities. However, *as a prerequisite to filing transmission/local distribution facility classifications and/or cost allocations with the Commission, utilities must consult with their state regulatory authorities. If the utility's classifications and/or cost allocations are supported by the state regulatory authorities and are consistent with the principles established by the Final Rule, the Commission will defer to such classifications and/or cost allocations.* We encourage public utilities and their state regulatory authorities to attempt to agree to utility-specific classifications and allocations that the utility may file at the Commission.

Order 888, at 31,784 (emphasis added; footnote omitted).

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8. To this end, PSE respectfully requests that the Commission issue a declaratory order confirming PSE's classification of transmission or distribution facilities, as proposed in Exhibit A, attached hereto. As discussed below, PSE has so classified these facilities by application of the seven indicators of local distribution promulgated by FERC for such purposes in Order 888. Taken together, application of the seven-factor test leads to the conclusion that PSE's 230 kV (and above) facilities are transmission facilities. These facilities connect PSE's systems to bulk transmission grids and support transfers to regional markets. All of PSE's facilities of 34 kV or less are inherently distribution facilities. As to PSE's 115 kV facilities, application of the seven-factor test, confirmed by PSE's power flow analysis, concludes that, with one exception discussed below, these facilities are distribution facilities, in that they function to serve local loads and rarely, if ever, serve to transfer power to other markets.

9. Further, as also discussed below, PSE respectfully requests that the Commission issue an accounting order authorizing the Company to apply such classification of transmission and distribution facilities in PSE's accounts and reports to the Commission, under and in light of the seven-factor test promulgated by FERC in Order 888.

III. FACTS AND ANALYSIS

A. Seven-Factor Test

10. PSE has applied FERC's seven-factor test and proposes the classification of transmission and distribution facilities set forth in Exhibit A.[1] An explanation of how these

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[1] The seven-factor test is not rigid; it is intended to be a flexible test that can account for unique regional or local conditions. Specifically, FERC held:

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factors were considered and applied is set forth in the Affidavit of J. Chris Reese, attached hereto as Exhibit B ("Reese Affidavit"). The seven factors applied to so classify, pursuant to Order 888, are:

> (1) Local distribution facilities are normally in close proximity to retail customers.
>
> (2) Local distribution facilities are primarily radial in character.
>
> (3) Power flows into local distribution systems; it rarely, if ever, flows out.
>
> (4) When power enters a local distribution system, it is not reconsigned or transported on to some other market.
>
> (5) Power entering a local distribution system is consumed in a comparatively restricted geographical area.
>
> (6) Meters are based at the transmission/local distribution interface to measure flows into the local distribution system.
>
> (7) Local distribution systems will be of reduced voltage.

> The seven-factor test is intended to provide sufficient flexibility to take into account unique local characteristics and historical usage of facilities used to serve retail customers. We specifically stated in the Final Rule that we will consider jurisdictional recommendations by states that take into account other technical factors that states believe are appropriate in light of historical uses of particular facilities. Moreover, we will defer to facility classifications and/or cost allocations that are supported by state regulatory authorities.

Order 888, at 30,342.

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B. First Factor

11. The first indicator of whether facilities are local distribution facilities is whether such facilities are normally in close proximity to retail customers. This indicator was satisfied for each distribution facility so classified in Exhibit A.

12. PSE applied this factor in the context of its electrical system. PSE assessed proximity with regard to population density, geographic and electrical considerations. For example, geographic distances covered by distribution facilities to customers can be significant in rural areas, which have low customer densities. Given that PSE serves retail customers only in the greater Puget Sound area, which has both densely populated and sparsely populated areas, PSE has applied the close proximity factor within the appropriate geographic, demographic and electrical contexts.[2] Reese Affidavit, ¶ 8.

C. Second Factor

13. The second indicator looks to whether the facilities in question are primarily radial in character. With few exceptions, the distribution facilities listed in Exhibit A satisfy this criteria.

14. The phrase "primarily radial" means, in a distribution system context, that the end-use customer is served from a limited set of closely coupled electrical sources during a given period. PSE also considered the term "radial" to apply to open-looped systems where the end-use customer's load is normally served from a single source but can be physically switched to another source. PSE also considered radial facilities to be closed-looped systems

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[2] Sparse customer densities have also led to the use of higher distribution equipment voltages to serve loads within broader geographic areas, as compared to urban electric systems. Therefore, the interpretations of the first, fifth and seventh distribution indicators are also dependent on the characteristics of PSE's entire electric system.

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constructed for the primary purpose of serving local loads. Such radial systems were constructed to serve local loads, not to move power between markets. Reese Affidavit, ¶ 7.

15. Additionally, PSE considered all connection lines to distribution substations, including those that are locally looped, to be primarily radial in character. PSE's decision to provide more than one line to a distribution substation is driven by the retail customers' need for additional reliability. The presence of the loop does not meaningfully enhance the system's ability to move power to other markets. Reese Affidavit, ¶ 7.

D. Third Factor

16. The third indicator addresses power flows. PSE determined that, for each of the distribution facilities identified in Exhibit A, power flows into, and rarely out of, its local distribution system. In this regard, the third indicator (power flows) was examined in conjunction with the fourth indicator (transfer to other markets). In other words, PSE considered such power flows in relation to whether such power was transferred to other markets (i.e., the fourth indicator). PSE's local distribution system extends throughout the greater Puget Sound area. PSE's 230 kV lines serve to integrate PSE's local distribution system, but have been classified as transmission due to other factors in the seven-part test. Reese Affidavit, ¶¶ 7, 8 and 9.

17. The phrase "into local distribution systems" raises the question of whether the flow is unidirectional in nature, (i.e., to PSE retail load rather than to another market). As determined by PSE's power flow analysis, power on radial and locally looped facilities flows directly to local loads, without re-entering the transmission network at some other point to reach another market. In Whatcom County, for example, local generation can cause power to flow from one portion of PSE's local distribution system to another portion of PSE's local distribution system, but not to other markets. Reese Affidavit, ¶¶ 8, 9 and 11.

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E. Fourth Factor

18. The fourth indicator considers whether power that enters a local distribution system is reconsigned or transported on to some other market. In the case of the distribution facilities identified in Exhibit A, the facilities PSE identifies as distribution facilities do not reconsign or transport power to other markets.

19. Other markets in the context of the seven-factor test refers to wholesale bulk power locations where there are multiple wholesale buyers and sellers. PSE considered high voltage lines used to move power between markets, such as power system interties, to be transmission facilities. Powerflow studies were used to identify other system facilities that give meaningful support to wheeling transactions between markets. Reese Affidavit, ¶¶ 6, 8 and 9.

20. Applying this indicator, and as determined by PSE's power flow analysis, PSE's 115 kV facilities were classified as facilities not providing meaningful support to wheeling transaction to other markets.[3] Therefore, as applied, this indicator supports PSE's classification of radial and locally looped systems as distribution. Reese Affidavit, ¶¶ 6, 8 and 9.

F. Fifth Factor

21. This indicator considers whether power entering a local distribution system is consumed in a comparatively restricted geographical area. All the distribution facilities listed in Exhibit A are distribution facilities in relation to this consideration. As with the first and

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[3] An exception to this classification is PSE's 115 kV Anderson Canyon-Beverly Line. This line was classified as transmission because it is non-radial in nature, connects commercial markets and has traditionally and contractually been used as part of PSE's cross-Cascade mountain range transmission capacity to access, for example, the Mid-Columbia wholesale power market.

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seventh indicators, PSE viewed this indicator in the context of the Company's electrical system and retail load within the greater Puget Sound area. When power enters PSE's local distribution system, it is consumed within the corresponding geographic area. In contrast, PSE treated transmission facilities as lines that provide pathways for power that is not necessarily consumed within the geographical area served at retail by PSE and corresponding to PSE's local distribution system. Reese Affidavit, ¶ 8.

G. Sixth Factor

22. The sixth factor looks to whether meters are based at the transmission/local distribution interface to measure flows into the local distribution system. Various power metering devices are used throughout PSE's system, not exclusively limited to transmission-distribution interfaces. However, each of the facilities identified as distribution facilities in Exhibit A are distribution facilities under this factor because each of these facilities has such transmission-distribution interface metering. Reese Affidavit, ¶ 10.

H. The Seventh Factor

23. The seventh factor addresses whether the facilities will be of reduced voltage. As a practical matter, PSE classified facilities with an operating voltage of 230 kV and above as transmission facilities, because such facilities connect PSE's system to the bulk transmission grids of other utilities, and support transfers between regional markets. Similarly, PSE considered facilities operating at 34 kV or less as inherently distribution facilities and incapable of meaningful transmission between markets. Other facilities, primarily 115 kV facilities, merited a more detailed study of such facilities' function and purpose. Reese Affidavit, ¶¶ 6, 7 and 8.[4]

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[4] See, footnote 3 above.

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24. In this regard, FERC Order 888, and more specifically the seven-factor test, provides a process to differentiate between the transmission and distribution facilities. PSE considered "reduced voltage" as a term relative to its system and customer load characteristics. In that respect, as distances between energy sources and loads increase, lower voltages are not efficient at distributing power to customers. The size of a customer's load, or other economic considerations, may drive the need for higher distribution line voltages. Reese Affidavit, ¶¶ 6, 7 and 8.

IV. ACCOUNTING TREATMENT

25. If the Commission adopts PSE's proposed classification, PSE proposes to account for such classification by making adjustments to its Electric Plant Chart of Accounts. Under WAC 480-100-031, this Commission utilizes the "'uniform system of accounts'" applicable to Class A and B electric utilities published by [FERC]." Under FERC's Uniform System of Accounts, 18 C.F.R. Part 101, FERC requires utilities to classify and report the original cost of the utility's transmission and distribution plant. For transmission plant facilities, FERC requires the utility to report miscellaneous power plant equipment, land and land rights, structures and improvements, station equipment towers and structures, poles and fixtures, overhead conductors and devices, underground conduit, underground conductors and devices and roads and trails, each of which is used in connection with transmission operations or purposes or is used primarily as transmission facilities. See Sections 350-359 of Part 101. Likewise, under FERC's Uniform System of Accounts, utilities are required to report distribution facilities such as land and land rights, structures and improvements, station equipment, storage battery equipment, poles, towers and fixtures, overhead conductors and devices, underground conduit, underground conductors and devices, each of which is used in connection with distribution operations or distribution purposes. See Sections 360-369 of

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Part 101. If PSE's proposed classification of transmission and distribution was adopted by the Commission, PSE would seek to report its transmission and distribution plant to FERC under and in light of such adoption by the Commission.

26. With regard to its reporting requirements to this Commission, PSE makes its reports concerning its transmission and distribution plant to this Commission in its semiannual commission basis and annual reports. Pursuant to WAC 480-100-031(5), PSE's annual report to this Commission consists of PSE's FERC Form No. 1. PSE proposes that if its proposed classification of transmission and distribution facilities was adopted by the Commission, PSE would, commencing from the date of Commission's order, report its transmission and distribution plant in its annual report (and PSE's semiannual commission basis reports) under and in light of such adoption by the Commission.

V. APPROPRIATENESS OF DECLARATORY ORDER

27. A declaratory order by the Commission adopting PSE's proposed classifications is appropriate in this case. By authority of WAC 480-09-230 and RCW 34.05.240(1), the Commission may enter a declaratory order upon a showing:

(a) That uncertainty necessitating resolution exists;

(b) That there is actual controversy arising from the uncertainty such that a declaratory order will not be merely an advisory opinion;

(c) That the uncertainty adversely affects the petitioner;

(d) That the adverse effect of uncertainty on the petitioner outweighs any adverse effects on others or on the general public that may likely arise from the order requested; and

(e) That the petition complies with any additional requirements established by the agency under subsection (2) of this section.

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The declaratory order requested by PSE meets these requirements, as set forth below.[5]

28. **Uncertainty Necessitating Resolution:** The uncertainty to be resolved by this Petition is the precise demarcation between PSE transmission and distribution facilities to be applied in the future to reports to this Commission and to FERC. As to the jurisdictional significance of such distinctions, FERC invites proposals filed by public utilities under the Federal Power Act to classify transmission and distribution facilities, and cost allocations associated therewith. However, this Commission must first speak to the issue. Indeed, FERC recognized that state determination of its jurisdictional boundaries under and in light of the seven-factor test was a necessary prerequisite to federal consideration of such questions:

> [A]s a prerequisite to filing transmission/local distribution facility classifications and/or cost allocations with [FERC], utilities *must* consult with their state regulatory authorities.

Order 888-A, at 30,336 (emphasis added).

29. **Actual Controversy Arising From the Uncertainty Such That a Declaratory Order Will Not Be Merely an Advisory Opinion:** The controversy arises from uncertainty as to which facilities are transmission facilities and which facilities are distribution facilities under and in light of the seven-factor test promulgated by FERC in Order 888.

30. **The Uncertainty Adversely Affects the Petitioner:** The uncertainty adversely affects PSE in that, absent resolution thereof, there is uncertainty as to whom PSE

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[5] The Commission has not established additional requirements under RCW 34.05.240(1)(e), but rather requires that petitions for declaratory order comply with the remaining subsections of RCW 34.05.240(1). See RCW 34.05.240(2); WAC 480-09-230.

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owes certain regulatory responsibilities determined under and in light of the seven-factor test promulgated by FERC in Order 888. In this regard, FERC said:

> We also believe it is important to develop mechanisms to avoid regulatory conflict and to help provide certainty to utilities as to which regulator has jurisdiction over which facilities.

Order 888, at 31,783.

31. **The Adverse Effect of Uncertainty on the Petitioner Outweighs any Adverse Effects on Others or on the General Public That May Likely Arise From the Order Requested:** Resolution of the questions raised in this petition will not result in any adverse effect on others or the general public. The public interest is served by clarification of regulatory jurisdiction of the Commission, and of FERC, under and in light of the seven-factor test promulgated by FERC in Order 888.[6]

VI. PRAYER FOR RELIEF

PSE respectfully requests that the Commission enter an order declaring the adoption of the proposed classification of transmission and distribution facilities set forth in Exhibit A to this Petition. PSE requests that the Commission enter an accounting order authorizing PSE to reflect such classification in its accounts.

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[6] Adoption of PSE's proposed classifications would have no effect on others or the general public during the period of rate stability set forth in the Merger Order. At the time of PSE's next general rate case, and to the extent such classifications are addressed in such a proceeding, PSE would not propose that the different classes of retail customers experience any impacts that arise solely from any change in the methodology for classification of facilities resulting from this Petition.

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DATED: January 2, 2001.

PERKINS COIE LLP

By _____
Markham A. Quehrn
William R. Maurer
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EXHIBIT A

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
3RD AC TRANS LINE	500	Oregon	N	N	N	N	N	N	N	Y	Transmn
BROADVIEW S Y-TOWNSEND A LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
BROADVIEW S Y-TOWNSEND B LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 3 TO S.Y.	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 4 TO S.Y.	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP S Y-BROADVIEW A LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP S Y-BROADVIEW B LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 1 TO S.Y.	230	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 2 TO S.Y.	230	Montana	N	N	N	N	N	N	N	Y	Transmn
BPA B'HAM-SEDRO WOOLLEY(BPA OWNED)	230	Whatcom Co	N	N	N	N	N	N	N	Y	Transmn
NORTH INTERTIE TRANSM LINE (SKAGIT)	230	Skagit Co	N	N	N	N	N	N	N	Y	Transmn
BPA CUSTER-MURRAY (SEDRO TAP)	230	Skagit Co	N	N	N	N	N	N	N	Y	Transmn
SEDRO WOOLEY-MARCH PT 230KV LN	230	Skagit Co	N	Y	Y	Y	Y	N	N	Y	Transmn
SEDRO-SCL BOTHELL	230	Skagit Co	N	N	N	N	N	N	N	Y	Transmn
HORSE RANCH TAP OF BPA MONROE-SNOHOMISH #1	230	Snohomish Co	N	N	N	N	N	N	N	Y	Transmn
BOTHELL-SAMMAMISH	230	King Co	N	N	N	N	N	N	N	Y	Transmn
MONROE-SAMMAMISH(+SNOKING TAP)	230	King Co	N	N	N	N	N	N	N	Y	Transmn
SAMM-MAPLE VALLEY #1	230	King Co	N	N	N	N	N	N	N	Y	Transmn
MAPLE VALLEY - TALBOT #1	230	King Co	N	N	N	N	N	N	N	Y	Transmn
MAPLE VALLEY - TALBOT #2	230	King Co	N	N	N	N	N	N	N	Y	Transmn
TALBOT - BERRYDALE #3	230	King Co	N	Y	Y	Y	Y	N	N	Y	Transmn
TALBOT-O'BRIEN #3 230KV LINE	230	King Co	N	N	N	N	N	N	N	Y	Transmn.
CHRISTOPHER-O'BRIEN #4	230	King Co	N	N	N	N	N	N	N	Y	Transmn
BPA COVINGTON-WHITE RIVER NO. 1	230	King Co	N	N	N	N	N	N	N	Y	Transmn
TRANSM LINE - WHITE RIVER - OLYMPIA (BPA)	230	Pierce Co	N	N	N	N	N	N	N	Y	Transmn
ROCKY REACH-WHITE RIVER	230	Chelan Co	N	N	N	N	N	N	N	Y	Transmn
TAUNTON - KITTITAS (GRANT)	115	Grant Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - WHIDBEY #1	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - WHIDBEY #2	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SO WHIDBEY - LANGLEY	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHIDBEY - GREENBANK #1	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHIDBEY - GREENBANK #2	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FAIRMOUNT-IRONDALE	115	Jefferson Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORT TOWNSEND #1	115	Jefferson Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors							>10% Flow	Class Transmn
			#1	#2	#3	#4	#5	#6	#7		
SHINE - IRONDALE	115	Jefferson Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ANDERSON CANYON-BEVERLY LINE	115	King Co	Y	N	N	N	N	Y	Y	N	Trasnmn
ASBURY - MIDWAY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE - FAIRWOOD	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE - KRAIN CORNER S.	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE - LAKE TRADITION #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE-LEA HILL	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEVERLY - COTTAGE BROOK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEVERLY-KENMORE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BOE. RENTON #1-BOE. RENTON #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BOEING-AUB#1 - BOEING-AUB #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CEDAR FALLS-SNOQUALMIE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CENTER TIE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CHRISTOPHER - STARWOOD	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CHRISTOPHER-BOEING AUBURN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CHRISTOPHER-MIDWAY 115KV LINE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
COTTAGE BROOK-MOORLANDS	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CUMBERLAND TAP	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
EASTSIDE - BELLEVUE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELEC HTS - KRAIN CRNR KING	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELLINGSON TAP	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
GREENWATER TAP	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KRAIN CORNER - ENUMCLAW	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KRAIN CORNER TAP	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - KENILWORTH	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - LAKE TRADITION	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - LOCHLEVEN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - MERCER ISLAND	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - PHANTOM LAKE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - ASBURY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - MIDWAY #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - MIDWAY #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - NORMANDY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - SOUTH BREMERTON	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN-CHRISTOPHER #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN-CHRISTOPHER #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - CENTER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
SAMMAMISH - COTTAGE BROOK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - KENILWORTH	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LAKE TRADITION	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LAKESIDE #1	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LAKESIDE #2	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LOCHLEVEN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH-MOORLANDS #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH-MOORLANDS #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMM-MOORLANDS #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SCL-TOLT-STILLWATER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLETON - O'BRIEN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLETON-BOEING RENTON #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLETON-LAKESIDE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLTON-LK TRADITION	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQ.- LK TRADITION #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQ.SW. - STILLWATER SUB.	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQ-LK. TRDTN. #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQUALMIE POWER HOUSE #1 PROJ	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQUALMIE POWER HOUSE #2 PROJ	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
STARWOOD - MIDWAY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
STARWOOD - TIDEFLATS	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
STILLWATER SUB-COTTAGE BROOK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - ASBURY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - BERRYDALE #3	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - CHRISTOPHER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - LAKESIDE #1	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - LAKESIDE #2	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - O'BRIAN #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-BERRYDALE #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-BOEING RENTON #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-LAKE TRADITION #1-S C	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-O'BRIEN #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - 115KV CHRISTOPHER-WEYERHAEUSER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - SNOQUALMIE LIGHT - N C	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - SNOQUALMIE POWER - S C	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - TALBOT HILL - MERCER ISLAND	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - TALBOT-LAKE TRADITION #2-S C	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors							>10% Flow	Class Transmn
			#1	#2	#3	#4	#5	#6	#7		
TRANSM LINE - WHITE RIVER - MIDWAY #3	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHITE RIVER - RENTON LIGHT	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHITE RIVER #1	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TWIN FALLS - HYAK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVE - STARWOOD	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - O'BRIEN #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-LEA HILL	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-O'BRIEN #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-RENTON POWER 55KV LINE	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BAINBRIDGE TAP	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BPA KITSAP - NAVAL YARD (BANGOR)	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BREMERTON - FOSS CORNER	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BREMERTON - NAVY YARD TIE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BREMERTON-KEYPORT 115KV LINE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FOSS CORNER - SALSBURY #1	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FOSS CORNER-KEYPORT 115KV LINE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FOSS CORNER-MURDEN COVE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP - NAVY YARD (BPA)	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP - VALLEY JUNCTION	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP-SOUTH BREMERTON NO.1	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP-SOUTH BREMERTON NO.3	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - SOUTH BREMERTON	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
S BREMERTON - BREMERTON	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
S.BREMERTON-FERNWOOD	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SALSBURY CBL-SHINE HEIGHTS CBL	14.5	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SO. BREM - VALLEY JUNCTION	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
VALLEY JUNCTION - FOSS CORNER	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CASCADE - CLE ELUM	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CLE ELUM - HYAK	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CLE ELUM - KITTITAS	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TONO-BLUMAER (LEWIS)	115	Lewis Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TONO-OLYMPIA (LEWIS)	115	Lewis Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ALDERTON - FREDERICKSON #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELECT.HEIGHTS-BOEING PUYALLUP	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELECTRON - ELECTRON HEIGHTS	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FREDERICKSON - ST. CLAIR	115	Pierce Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
ST CLAIR - FERN HILL	55	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
TACOMA POWER	55	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHITE RIVER - FERN HILL	55	Pierce Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHT.RVR.-ELECTRON HEIGHTS #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - ALDERTON #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - ALDERTON #3	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER GEN - WHITE RIVER	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-ELECT HTS#1	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-KRAIN CORNER	55	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-ST CLAIR 115KV	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RVR-BOE.AUBURN #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHT.RVR.-ALDERTON #4	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BAKER-SEDRO WOOLLEY #1 PROJECT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BAKER-SEDRO WOOLLEY #2-PROJECT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEAVER LAKE - MARCH POINT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEVERLY PARK-BEAVER LAKE	115	Skagit Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
BPA B'HAM-SEDRO WOOLLEY(BPA OWNED)	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BURROWS BAY - FIDALGO	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CONCRETE	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LOWER BAKER PROJECT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - REFINERY #1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - REFINERY #2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT TO TEXACO WEST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT-BURROWS BAY 1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT-BURROWS BAY 2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT-TEXACO EAST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY - MARCH POINT #1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY - MARCH POINT #2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY - MT VERNON #2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY-MT VERNON #1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY-TEXACO EAST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO-WOOLLEY-BHAM#3	115	Skagit Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SEDRO-WOOLLEY-BHAM#4	115	Skagit Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SHANNON 21 KOMA KULSHAN	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TEXACO WEST TO TEXACO EAST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOHOMISH - BEVERLY #4 (Facilities on BPA Lines)	115	Snohomish Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BLUMAER - ST CLAIR	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BPA - OLYMPIA #1	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
BPA - OLYMPIA #2	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELECTRON HEIGHTS-BLUMAER	115	Thurston Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - AIRPORT	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - PLUM STREET	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - ST CLAIR #1	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - ST CLAIR #2	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - WEST OLY #2	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - WEST OLYMPIA #1	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PLUM ST - PLEASANT GLADE	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PLUM ST - WEST OLYMPIA	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ST CLAIR - PLEASANT GLADE	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TONO OLY - TONO BLMR	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - OLYMPIA	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ARCO CENTRAL - ARCO NORTH	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ARCO CENTRAL-ARCO SOUTH	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - BPA #2	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - G E P A C	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - O P C #1	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - O P C #2	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM-BPA #3	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM-KENDALL	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ENSERCH-BELLINGHAM #1 115KV LN	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ENSERCH-BELLINGHAM #2 115KV LN	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
NOOKSACK-KENDALL	55	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORTAL WAY - ARCO NORTH	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORTAL WAY-ARCO CENTRAL	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORTAL WAY-BELLINGHAM	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHANNON 21 KOMA KULSHAN	34.5	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SUMAS-KENDALL	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SUMAS-LYNDEN	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TERRELL - BELLINGHAM NO. 1 115KV	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TERRELL SUB-ARCO SOUTH SUB	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
UPPER BAKER	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHATCOM NO. 1 (LYN-BPA-BHM)	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITEHORN - ARCO CEN SUB	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
BPA-GARRISON SUBSTATION	500	Montana	Transmission
COLSTRIP 3&4 TRANS.SUB(@PLANT)	500	Montana	Transmission
COLSTRIP TRANS.SWITCH YARD	500	Montana	Transmission
BROADVIEW TRANS.SWITCH YARD	500	Montana	Transmission
COLSTRIP 1&2 TRANS.SUB(@PLANT)	230	Montana	Transmission
3RD AC LINE SUBSTATION	500	Montana	Transmission
BPA - PAUL SUBSTATION	500	Lewis County	Transmission
PORTAL WAY SUBSTATION-230 kV	230	Whatcom County	Transmission
MARCH POINT SWITCH STATION-230 kV	230	Skagit County	Transmission
SEDRO WOOLLEY SWITCH STATION-230 kV	230	Skagit County	Transmission
HORSE RANCH SUBSTATION	230	Snohomish County	Transmission
BERRYDALE SW STATION-230 kV	230	King County	Transmission
CHRISTOPHER SUBSTATION-230 kV	230	King County	Transmission
O'BRIEN SUBSTATION	230	King County	Transmission
SAMMAMISH SUBSTATION-230 kV	230	King County	Transmission
TALBOT HILL SUBSTATION-230 kV	230	King County	Transmission
CASCADE SUBSTATION-230 kV	230	Kittitas County	Transmission
WHITE RIVER - 230 KV SUB	230	Pierce County	Transmission
TAUNTON	115	Adams County	Distribution
CLOVER VALLEY SUBSTATION	115	Island County	Distribution
FREELAND SUBSTATION	115	Island County	Distribution
GREENBANK SUBSTATION	115	Island County	Distribution
HILLCREST SUBSTATION	115	Island County	Distribution
SOUTH WHIDBEY GEN STN	115	Island County	Distribution
SWANTOWN SUBSTATION	115	Island County	Distribution
WHIDBEY	115	Island County	Distribution
BPA - FAIRMOUNT SUBSTATION -PSE Facilities	115	Jefferson County	Distribution
IRONDALE SUBSTATION	115	Jefferson County	Distribution
KEARNEY ST SUBSTATION	115	Jefferson County	Distribution
QUILCENE SUBSTATION	115	Jefferson County	Distribution
ASBURY SUBSTATION	115	King County	Distribution
AVONDALE SUBSTATION	115	King County	Distribution
BARNABIE CABLE STN	115	King County	Distribution
BELMORE SUBSTATION	115	King County	Distribution
BERRYDALE SW STATION-115 kV	115	King County	Distribution
BLACK DIAMOND SUBSTATION	115	King County	Distribution
BOEING AUBURN #1 SUBSTATION	115	King County	Distribution
BOEING AUBURN #2 SUBSTATION	115	King County	Distribution
BOEING RENTON #1 SUBSTATION	115	King County	Distribution
BOEING-RENTON #2 SUBSTATION	115	King County	Distribution
BOW LAKE SUBSTATION	115	King County	Distribution
BPA COVINGTON SUBSTATION	115	King County	Distribution
BRIDLE TRAILS SUBSTATION	115	King County	Distribution
CAMBRIDGE SUBSTATION	115	King County	Distribution
CENTER SUBSTATION	115	King County	Distribution
CHRISTOPHER SUBSTATION-115 kV	115	King County	Distribution
CLYDE HILL SUBSTATION	115	King County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
COLLEGE SUBSTATION	115	King County	Distribution
COTTAGE BROOK SUBSTATION	115	King County	Distribution
COVE TERMINAL STATION	115	King County	Distribution
DES MOINES SUBSTATION	115	King County	Distribution
EARLINGTON SUBSTATION	115	King County	Distribution
EAST VALLEY SUBSTATION	115	King County	Distribution
EASTGATE SUBSTATION	115	King County	Distribution
ENATAI TERMINAL STATION	115	King County	Distribution
EVERGREEN SUBSTATION	115	King County	Distribution
FAIRWOOD SUBSTATION	115	King County	Distribution
FALCON SUBSTATION	115	King County	Distribution
FLOOD TERMINAL STATION	115	King County	Distribution
GRADY SUBSTATION	115	King County	Distribution
HARVEST SUBSTATION	115	King County	Distribution
HIGHLANDS SUBSTATION	115	King County	Distribution
HOBART SUBSTATION	115	King County	Distribution
HOLLYWOOD SUBSTATION	115	King County	Distribution
HOUGHTON SUBSTATION	115	King County	Distribution
INGLEWOOD SUBSTATION	115	King County	Distribution
KENILWORTH SUBSTATION	115	King County	Distribution
KENMORE SUBSTATION	115	King County	Distribution
KENT SUBSTATION	115	King County	Distribution
KITTS CORNER SUBSTATION	115	King County	Distribution
KLAHANNIE SUBSTATION	115	King County	Distribution
KRAIN CORNER SUBSTATION-115 kV	115	King County	Distribution
LAKE LEOTA SUBSTATION	115	King County	Distribution
LAKE TRADITION SUBSTATION	115	King County	Distribution
LAKE WILDERNESS SUBSTATION	115	King County	Distribution
LAKESIDE SWITCH STATION	115	King County	Distribution
LAKOTA SUBSTATION	115	King County	Distribution
LEA HILL SUBSTATION	115	King County	Distribution
LIQUID AIR SUBSTATION	115	King County	Distribution
LOCHLEVEN SUBSTATION	115	King County	Distribution
M STREET SUBSTATION	115	King County	Distribution
MANHATTAN SUBSTATION	115	King County	Distribution
MAPLEWOOD SUBSTATION	115	King County	Distribution
MARINE VIEW SUBSTATION	115	King County	Distribution
MEDINA SUBSTATION	115	King County	Distribution
MERIDETH SUBSTATION	115	King County	Distribution
METRO - RENTON (PROPOSED)	115	King County	Distribution
MIDLAKES SUBSTATION	115	King County	Distribution
MIDWAY SWITCH STATION	115	King County	Distribution
MIRRORMONT SUBSTATION	115	King County	Distribution
MOORLANDS SUBSTATION	115	King County	Distribution
NELSEN CABLE STATION	115	King County	Distribution
NORKIRK SUBSTATION	115	King County	Distribution
NORPAC SUBSTATION	115	King County	Distribution
NORTH BELLEVUE SUBSTATION	115	King County	Distribution
NORTH BOTHELL SUBSTATION	115	King County	Distribution
NORTHRUP SUBSTATION	115	King County	Distribution
NORWAY HILL SUBSTATION	115	King County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
O'BRIEN SUBSTATION	115	King County	Distribution
OLYMPIC RENTON SUBSTATION	115	King County	Distribution
ORCHARD SUBSTATION	115	King County	Distribution
ORILLIA SUBSTATION	115	King County	Distribution
OSCEOLA SUBSTATION	115	King County	Distribution
PACCAR SUBSTATION	115	King County	Distribution
PEASLEY CANYON SUBSTATION	115	King County	Distribution
PINE LAKE SUBSTATION	115	King County	Distribution
PIPE LAKE SUBSTATION	115	King County	Distribution
QUENDALL TERMINAL STATION	115	King County	Distribution
REDMOND SUBSTATION	115	King County	Distribution
REDONDO SUBSTATION	115	King County	Distribution
RENTON JUNCTION SUBSTATION	115	King County	Distribution
ROBINSON PT TERMINAL STATION	115	King County	Distribution
ROLLING HILLS SUBSTATION	115	King County	Distribution
ROSE HILL SUBSTATION	115	King County	Distribution
S DES MOINES TERMINAL STATION	115	King County	Distribution
SAHALEE SUBSTATION	115	King County	Distribution
SAMMAMISH SUBSTATION-115 kV	115	King County	Distribution
SEQUOIA SUBSTATION	115	King County	Distribution
SHUFFLETON @ PLANT	115	King County	Distribution
SHUFFLETON SUBSTN STORAGE-115 kV	115	King County	Distribution
SKYKOMISH SUBSTATION	115	King County	Distribution
SNOQUALMIE #1 @ PLANT	115	King County	Distribution
SNOQUALMIE #2 @ PLANT	115	King County	Distribution
SNOQUALMIE SUBSTATION	115	King County	Distribution
SNOQUALMIE SW STATION	115	King County	Distribution
SOOS CREEK SUBSTATION	115	King County	Distribution
SOUTH BELLEVUE SUBSTATION	115	King County	Distribution
SOUTHCENTER SUBSTATION	115	King County	Distribution
SPIRITBROOK SUBSTATION	115	King County	Distribution
STARWOOD SWITCH STATION	115	King County	Distribution
STILLWATER SWITCH STATION	115	King County	Distribution
SWEPTWING SUBSTATION	115	King County	Distribution
TALBOT HILL SUBSTATION-115 kV	115	King County	Distribution
TUKWILA CABLE STATION	115	King County	Distribution
TWIN FALLS SWITCHING STATION	115	King County	Distribution
VASHON ISLAND	115	King County	Distribution
VICTORIA PARK	115	King County	Distribution
VITULLI SUBSTATION	115	King County	Distribution
WEST CAMPUS	115	King County	Distribution
WEST ISSAQUAH	115	King County	Distribution
BPA - KITSAP SUBSTATION-PSE Facilities	115	Kitsap County	Distribution
BREMERTON SUBSTATION	115	Kitsap County	Distribution
CENTRAL KITSAP SUBSTATION	115	Kitsap County	Distribution
CHRISTENSEN'S CORNER SUBSTATION	115	Kitsap County	Distribution
COMMAND PT.TERMINAL STATION	115	Kitsap County	Distribution
EAST PORT ORCHARD SUBSTATION	115	Kitsap County	Distribution
FOSS CORNER SUBSTATION	115	Kitsap County	Distribution
KEYPORT SUBSTATION	115	Kitsap County	Distribution
LONG LAKE SUBSTATION	115	Kitsap County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
MILLER BAY SUBSTATION	115	Kitsap County	Distribution
PORT MADISON SUBSTATION	115	Kitsap County	Distribution
SILVERDALE SUBSTATION	115	Kitsap County	Distribution
SINCLAIR SUBSTATION	115	Kitsap County	Distribution
SOUTH BREMERTON SUBSTATION	115	Kitsap County	Distribution
SOUTH KEYPORT SUBSTATION	115	Kitsap County	Distribution
TRACYTON	115	Kitsap County	Distribution
VALLEY JUNCTION	115	Kitsap County	Distribution
CASCADE SUBSTATION-115 kV	115	Kittitas County	Distribution
CLE ELUM SUBSTATION	115	Kittitas County	Distribution
EASTON SUBSTATION	115	Kittitas County	Distribution
HYAK SUBSTATION	115	Kittitas County	Distribution
KITTITAS SUBSTATION	115	Kittitas County	Distribution
WOLDALE	115	Kittitas County	Distribution
TONO	115	Lewis County	Distribution
ALDERTON SUBSTATION	115	Pierce County	Distribution
BOEING PUYALLUP SUBSTATION	115	Pierce County	Distribution
BONNEY LAKE SUBSTATION	115	Pierce County	Distribution
CEDARHURST SUBSTATION	115	Pierce County	Distribution
DUPONT SUBSTATION	115	Pierce County	Distribution
ELECTRON HEIGHTS SWITCH STATION-115 kV	115	Pierce County	Distribution
ELECTRON TRANSMISSION STATION	115	Pierce County	Distribution
FAIRCHILD SUBSTATION	115	Pierce County	Distribution
FREDERICKSON SUBSTATION	115	Pierce County	Distribution
FRUITLAND SUBSTATION	115	Pierce County	Distribution
HEMLOCK SUBSTATION	115	Pierce County	Distribution
KAPOWSIN SUBSTATION	115	Pierce County	Distribution
LAKE TAPPS-115 kV	115	Pierce County	Distribution
ORTING SUBSTATION	115	Pierce County	Distribution
RHODES LAKE SUBSTATION	115	Pierce County	Distribution
SHAW SUBSTATION	115	Pierce County	Distribution
SUMNER SUBSTATION	115	Pierce County	Distribution
WHITE RIVER -115 KV SUB	115	Pierce County	Distribution
WOODLAND	115	Pierce County	Distribution
ANACORTES SUBSTATION	115	Skagit County	Distribution
BAKER RIVER LWR @ PLT	115	Skagit County	Distribution
BAKER RIVER LWR SW, COMMON	115	Skagit County	Distribution
BEAVER LAKE S W STATION	115	Skagit County	Distribution
BURROWS BAY SUBSTATION	115	Skagit County	Distribution
FREDONIA SUBSTATION	115	Skagit County	Distribution
HAMILTON SUBSTATION	115	Skagit County	Distribution
MARCH POINT SWITCH STATION-115 kV	115	Skagit County	Distribution
MT VERNON SUBSTATION	115	Skagit County	Distribution
NORLUM SUBSTATION	115	Skagit County	Distribution
OLYMPIC-AVON SUBSTATION	115	Skagit County	Distribution
PETH'S CORNER SUBSTATION	115	Skagit County	Distribution
RITA STREET SUBSTATION	115	Skagit County	Distribution
RIVER BEND SUBSTATION	115	Skagit County	Distribution
SEDRO WOOLLEY SWITCH STATION-115 kV	115	Skagit County	Distribution
TEXACO EAST	115	Skagit County	Distribution
TEXACO WEST	115	Skagit County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
BEVERLY PARK SUBSTATION	115	Snohomish County	Distribution
HILTON LAKE SUBSTATION	115	Snohomish County	Distribution
BARNES LAKE SUBSTATION	115	Thurston County	Distribution
BLUMAER SUBSTATION	115	Thurston County	Distribution
BPA - OLYMPIA SUBSTATION	115	Thurston County	Distribution
CHAMBERS SUBSTATION	115	Thurston County	Distribution
DECATUR SUBSTATION	115	Thurston County	Distribution
LACEY SUBSTATION	115	Thurston County	Distribution
LUHR BEACH SUBSTATION-115 kV	115	Thurston County	Distribution
MCKINLEY SUBSTATION	115	Thurston County	Distribution
MOTTMAN SUBSTATION	115	Thurston County	Distribution
OLYMPIA BREWERY CO. SUBSTATION	115	Thurston County	Distribution
OLYMPIA SUBSTATION-115 kV	115	Thurston County	Distribution
PATTERSON SUBSTATION	115	Thurston County	Distribution
PRINE - FUTURE USE	115	Thurston County	Distribution
ROCHESTER SUBSTATION	115	Thurston County	Distribution
SOUTHWICK SUBSTATION	115	Thurston County	Distribution
ST CLAIR SUBSTATION-115 kV	115	Thurston County	Distribution
WEST OLYMPIA	115	Thurston County	Distribution
YELM	115	Thurston County	Distribution
ARCO CENTRAL SUBSTATION	115	Whatcom County	Distribution
ARCO-NORTH SUBSTATION	115	Whatcom County	Distribution
ARCO-SOUTH SUBSTATION	115	Whatcom County	Distribution
BAKER RIVER UPR @ PLT	115	Whatcom County	Distribution
BAKERVIEW SUBSTATION	115	Whatcom County	Distribution
BELLINGHAM SUBSTATION-115 kV	115	Whatcom County	Distribution
WHATCOM PUD SUBSTATION-PSE Facilities	115	Whatcom County	Distribution
BPA - BELLINGHAM SUBSTATION-PSE Facilities	115	Whatcom County	Distribution
BRITTON ROAD SUBSTATION	115	Whatcom County	Distribution
ENCOGEN STATION	115	Whatcom County	Distribution
ENSERCH SUBSTATION	115	Whatcom County	Distribution
ENTERPRISE PUD PUMP	115	Whatcom County	Distribution
HANNEGAN SUBSTATION	115	Whatcom County	Distribution
KENDALL SUBSTATION	115	Whatcom County	Distribution
LA BOUNTY SUBSTATION	115	Whatcom County	Distribution
LYNDEN SUBSTATION	115	Whatcom County	Distribution
NOOKSACK @ PLANT	115	Whatcom County	Distribution
NUGENT'S CORNER SUBSTATION	115	Whatcom County	Distribution
PORTAL WAY SUBSTATION-115 kV	115	Whatcom County	Distribution
SCHUETT SUBSTATION	115	Whatcom County	Distribution
SHANNON SUBSTATION-115 kV	115	Whatcom County	Distribution
SLATER SUBSTATION	115	Whatcom County	Distribution
SUMAS SUBSTATION	115	Whatcom County	Distribution
TERRELL	115	Whatcom County	Distribution
VAN WYCK SUB	115	Whatcom County	Distribution
VISTA	115	Whatcom County	Distribution
WATERFRONT	115	Whatcom County	Distribution
WHITEHORN	115	Whatcom County	Distribution
WOBURN STREET	115	Whatcom County	Distribution
PORT LUDLOW SUBSTATION	66	Jefferson County	Distribution
KRAIN CORNER SUBSTATION-55 kV	55	King County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
SHUFFLETON SUBSTN STORAGE-55 kV	55	King County	Distribution
STEVENSON SWITCH STATION	55	King County	Distribution
ELECTRON HEIGHTS SWITCH STATION-55 kV	55	Pierce County	Distribution
FERN HILL SUBSTATION	55	Pierce County	Distribution
LAKE TAPPS-55 kV	55	Pierce County	Distribution
WHITE RIVER - 55 KV SUB	55	Pierce County	Distribution
MARCH POINT SWITCH STATION-55 kV	55	Skagit County	Distribution
SEDRO WOOLLEY SWITCH STATION-55 kV	55	Skagit County	Distribution
CAPITOL SUBSTATION	55	Thurston County	Distribution
LUHR BEACH SUBSTATION-55 kV	55	Thurston County	Distribution
OLYMPIA SUBSTATION-55 kV	55	Thurston County	Distribution
PLEASANT GLADE SUBSTATION	55	Thurston County	Distribution
PLUM STREET SUBSTATION	55	Thurston County	Distribution
ST CLAIR SUBSTATION-55 kV	55	Thurston County	Distribution
THURSTON	55	Thurston County	Distribution
BELLINGHAM SUBSTATION-55 kV	55	Whatcom County	Distribution
OLD TOWN SUBSTATION	55	Whatcom County	Distribution
SHANNON SUBSTATION-34.5 kV	34.5	Whatcom County	Distribution

EXHIBIT B

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of PUGET SOUND ENERGY, INC. for a Declaratory Order and Accounting Order Regarding the Classification of Certain Facilities and Accounting Treatment Consistent Therewith.	AFFIDAVIT OF J. CHRIS REESE

STATE OF WASHINGTON)
) ss:
COUNTY OF KING)

I, J. CHRIS REESE, being first duly sworn on oath, depose and say:

1. My name is J. Chris Reese. My title is System Planning Manager for Puget Sound Energy, Inc., ("PSE"), based in Bellevue, Washington. My business address is P.O. Box 97034, Bellevue, Washington 98009-9734.

2. I graduated from the University of Utah in 1973 with a B.S. in Electrical Engineering and received a Master of Engineering in Electrical Engineering in 1979. Prior to my current position, I worked as a Transmission System Planner with Utah Power and Light from 1976 to 1979. Since 1979, I have been employed by PSE. I held various positions, including Transmission System Planner, Power Resource Engineer, and Consulting Engineer.

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I have testified in several proceedings before the Federal Energy Regulatory Commission ("FERC") and also the Bonneville Power Administration on transmission issues.

3. I prepared PSE's proposed Transmission and Distribution Facilities classification document, and this document is attached to PSE's Petition For Declaratory Order and For Accounting Order as Exhibit A. I personally performed the work associated with the preparation, analysis and support for that document.

4. In preparation of PSE's proposed Transmission and Distribution Facilities classification document, I reviewed the portions of FERC Order 888 that adopted the seven indicators of local distribution. Then I examined and reviewed some publicly available references to interpretations of the FERC seven-factor test in another jurisdiction. With that background information, I considered certain PSE facilities that had been accounted as transmission and distribution facilities, and evaluated these facility classifications under and in light of the seven-factor test. My conclusions are summarized in the proposed Transmission and Distribution Facilities classification document referenced in paragraph 3 above.

5. In Order 888, FERC provided seven indicators to guide the transmission and distribution classification process. As set forth in the Order, those indicators are:

(1) Local distribution facilities are normally in close proximity to retail customers.

(2) Local distribution facilities are primarily radial in character.

(3) Power flows into local distribution systems; it rarely, if ever, flows out.

(4) When power enters a local distribution system, it is not re-consigned or transported on to some other market.

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(5) Power entering a local distribution system is consumed in a comparatively restricted geographical area.

(6) Meters are based at the transmission/local distribution interface to measure the flows into the local distribution system.

(7) Local distribution systems will be of reduced voltage.

6. Applying these factors, I treated as transmission all electrical facilities that have an operating voltage of 230 kV and above, which connect PSE's electrical system to wholesale markets. By markets, I mean wholesale bulk power locations where there are multiple wholesale buyers and sellers. One of the uses of such facilities is to support power transportation to other markets. Further, these facilities are not primarily radial in nature. Taken together, these indicators support the conclusion that PSE's 230 kV and above facilities should remain classified as transmission.

7. Next, I determined whether other facilities of lower voltage (i.e., 115 kV and below) should be classified as transmission or distribution facilities. I made the determination relative to system and customer load characteristics. With few exceptions, all such facilities are radial. The end-use customer is served from a limited set of closely coupled (electrically and geographically) electrical sources. This includes open-looped and close-looped facilities, constructed for the primary purpose of serving local loads. With few exceptions, power flows through these distribution facilities to serve local loads, but it rarely, if ever, flows out PSE's local distribution system. Power entering the local distribution system is consumed within the corresponding geographical area.

8. PSE's local distribution system generally covers the greater Puget Sound area (less areas served by other utilities). Some of PSE's 230 kV and above transmission facilities, in addition to the transmission functions discussed above, serve to connect and integrate PSE's

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local distribution system. The 115 kV (or less) facilities that comprise the local distribution system are generally located in close proximity to the customers they serve. Actual distances vary, depending upon factors such as geographic features and urban/rural densities.

9. My analysis assumes that any facility that normally has more than 10% of the total incremental power transfer across boundaries to other markets should be classified as transmission. I used incremental power flows of approximately 1000 megawatts to perform my analysis. One part of the analysis assumed that an incremental change of approximately 1000 megawatts of power were to be transferred from the north, as measured at the westside British Columbia/Washington border, to California in the south. A second part of the analysis assumed an incremental power flow of approximately 1000 megawatts from the California/Oregon border and lower Columbia generation in the south to the north. as measured at the westside British Columbia border. None of PSE's 115 kV (or less) facilities came near 10% of the incremental change in power flow.

10. PSE employs various power metering devices throughout PSE's system. Such metering is not exclusively limited to transmission-distribution interfaces. All of the facilities that I determined to be distribution facilities are metered at the transmission/distribution interface.

11. Taken together, application of the seven-factor test leads to the conclusion that PSE's 230 kV (and above) facilities are transmission facilities. These facilities connect PSE's systems to bulk transmission grids and support transfers to regional markets. All of PSE's facilities of 34 kV or less are inherently distribution facilities. As to PSE's 115 kV facilities, application of the seven-factor test, confirmed by my power flow analysis, caused me to

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conclude, with one exception,[1] that these facilities are distribution facilities, in that they function to serve local loads and rarely, if ever, serve to transfer power to other markets.

DATED: January 2, 2001.

J. Chris Reese

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

On this 2nd day of January, 2001, before me, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared J. CHRIS REESE, to me known to be the individual who executed the foregoing Affidavit, and acknowledged that he signed the same as his free and voluntary act and deed, for the uses and purposes therein mentioned.

GIVEN UNDER my hand and official seal hereto affixed the day and year in this certificate first above written.

Print Name: Kara L. Herron
Notary Public in and for the State of Washington,
residing at Issaquah, WA
My commission expires: 9/9/02

[1] An exception to this classification is PSE's 115 kV Anderson Canyon-Beverly Line. This line was classified as transmission because it is non-radial in nature, connects commercial markets and has traditionally been used as part of PSE's cross-Cascade mountain range transmission capacity to access, for example, the Mid-Columbia wholesale power market.

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BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of PUGET SOUND ENERGY, INC. for a Declaratory Order and Accounting Order Regarding the Classification of Certain Facilities and Accounting Treatment Consistent Therewith.	NO. _____ (PROPOSED) ORDER

On January 2, 2001, Puget Sound Energy, Inc. ("PSE") filed a petition for a declaratory order requesting the Commission adopt PSE's proposed classification of transmission and distribution facilities and for an accounting order authorizing PSE to reflect such classifications in its accounts.

PSE's Petition states that its proposed classification of transmission and distribution facilities, and the corresponding accounting treatment of such classifications in PSE's accounts, is an essential component to the demarcation of the boundaries of this Commission's jurisdiction and that of the Federal Energy Regulatory Commission ("FERC"). PSE states that such classifications serve the public interest by promoting greater certainty in regulation, and by avoiding regulatory conflicts. In that regard, PSE quotes FERC regarding this

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Commission's determination of its jurisdiction over local distribution facilities (i.e., facilities other than facilities used in transmitting electric power in interstate commerce):

> [W]e intend to provide *broad deference to states in determining what facilities are Commission-jurisdictional transmission facilities and what facilities are state-jurisdictional local distribution facilities*, so long as our comparability principles are not compromised and we are able to fulfill our responsibilities under the statute.

Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities, F.E.R.C. Stats. & Regs. ¶ 31,048, at 30,345 (1997) (emphasis added) ("Order 888-A").

I. BACKGROUND

PSE is a public service company engaged in the generation, transmission, distribution and sale at retail of electric energy in the State of Washington. As such, certain actions of PSE are subject to the authority of the Commission to regulate the same, in the public interest, pursuant to RCW 80.01.040 and other applicable public service laws.

FERC regulates facilities used by PSE in transmitting electric energy in interstate commerce, pursuant to applicable provisions of the Federal Power Act. See FPA § 201; 16 U.S.C. §824.

FERC has, from time to time, issued orders that bear upon the lines of demarcation between its regulatory authority and that of the state. See Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public Utilities and Transmitting Utilities, F.E.R.C. Stats. & Regs. ¶ 31,036, at 31,770 (1996) ("Order 888"). In Order 888, FERC acknowledged, among other things, that states have jurisdiction over local distribution facilities while the federal

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government exercises jurisdiction over the rates, terms and conditions of unbundled retail transmission in interstate commerce by public utilities.

The classification of transmission and distribution facilities for various regulatory purposes may lead to uncertainty and potential conflicts regarding the boundaries of federal/state jurisdiction. To avoid these issues and concerns, FERC has held:

> As a means of facilitating jurisdictional line-drawing, we will entertain proposals by public utilities, filed under section 205 of the FPA, containing classifications and/or cost allocations for transmission and local distribution facilities. However, *as a prerequisite to filing transmission/local distribution facility classifications and/or cost allocations with the Commission, utilities must consult with their state regulatory authorities. If the utility's classifications and/or cost allocations are supported by the state regulatory authorities and are consistent with the principles established by the Final Rule, the Commission will defer to such classifications and/or cost allocations.* We encourage public utilities and their state regulatory authorities to attempt to agree to utility-specific classifications and allocations that the utility may file at the Commission.

Order 888, at 31,784 (emphasis added).

To this end, PSE requests that the Commission issue a declaratory order confirming PSE's classification of transmission or distribution facilities, as PSE has proposed such classifications in Exhibit A to its Petition. Such classifications are attached to this Order as Appendix A. As discussed below, PSE states that it classified these facilities by application of the seven indicators of local distribution promulgated by FERC for such purposes in Order 888. PSE states that, taken together, application of the seven-factor test leads to the conclusion that PSE's 230 kV (and above) facilities are transmission facilities. These facilities connect PSE's systems to bulk transmission grids and support transfers to regional markets. PSE also states that all of PSE's facilities of 34 kV or less are inherently distribution facilities. As to PSE's 115 kV facilities, PSE states that application of the seven-factor test, confirmed

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by PSE's power flow analysis, demonstrates that, with one exception discussed below, these facilities are distribution facilities, in that they function to serve local loads and rarely, if ever, serve to transfer power to other markets.

Further, as also discussed below, PSE requested that the Commission issue an accounting order authorizing the Company to apply such classification of transmission and distribution facilities in PSE's accounts and reports to the Commission, under and in light of the seven-factor test promulgated by FERC in Order 888.

II. ANALYSIS

A. Seven-Factor Test

In its Petition, PSE applied FERC's seven-factor test and proposes the classification of transmission and distribution facilities set forth in Appendix A.[1] An explanation of how PSE considered these factors and applied was set forth in the Affidavit of J. Chris Reese, PSE's System Planning Manager, attached to the Petition ("Reese Affidavit"). The seven factors applied to so classify, pursuant to Order 888, are:

> (1) Local distribution facilities are normally in close proximity to retail customers.

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[1] PSE notes that the seven-factor test is not rigid and is intended by FERC to be a flexible test that can account for unique regional or local conditions:

> The seven-factor test is intended to provide sufficient flexibility to take into account unique local characteristics and historical usage of facilities used to serve retail customers. We specifically stated in the Final Rule that we will consider jurisdictional recommendations by states that take into account other technical factors that states believe are appropriate in light of historical uses of particular facilities. Moreover, we will defer to facility classifications and/or cost allocations that are supported by state regulatory authorities.

Order 888, at 30,342.

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(2) Local distribution facilities are primarily radial in character.

(3) Power flows into local distribution systems; it rarely, if ever, flows out.

(4) When power enters a local distribution system, it is not reconsigned or transported on to some other market.

(5) Power entering a local distribution system is consumed in a comparatively restricted geographical area.

(6) Meters are based at the transmission/local distribution interface to measure flows into the local distribution system.

(7) Local distribution systems will be of reduced voltage.

B. First Factor

Under FERC's seven-factor test, the first indicator of whether facilities are local distribution facilities is whether such facilities are normally in close proximity to retail customers. PSE states that this indicator was satisfied for each distribution facility so classified in Appendix A.

PSE applied this factor in the context of its electrical system. PSE assessed proximity with regard to population density, geographic and electrical considerations. For example, geographic distances covered by distribution facilities to customers can be significant in rural areas, which have low customer densities. Given that PSE serves retail customers only in the greater Puget Sound area, which has both densely populated and sparsely populated areas, PSE applied the close proximity factor within the appropriate geographic, demographic and electrical contexts.[2] Reese Affidavit, ¶ 8.

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[2] Sparse customer densities have also led to the use of higher distribution equipment voltages to serve loads within broader geographic areas, as compared to urban electric systems. Therefore, the

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C. Second Factor

The second indicator looks to whether the facilities in question are primarily radial in character. PSE states that with few exceptions, the distribution facilities listed in Exhibit A satisfy this criteria.

The phrase "primarily radial" means, in a distribution system context, that the end-use customer is served from a limited set of closely coupled electrical sources during a given period. PSE also considered the term "radial" to apply to open-looped systems where the end-use customer's load is normally served from a single source but can be physically switched to another source. PSE also considered radial facilities to be closed-looped systems constructed for the primary purpose of serving local loads. PSE asserts that such radial systems were constructed to serve local loads, not to move power between markets. Reese Affidavit, ¶ 7.

Additionally, PSE states that it considered all connection lines to distribution substations, including those that are locally looped, to be primarily radial in character. PSE's decision to provide more than one line to a distribution substation is driven by the retail customers' need for additional reliability. The presence of the loop does not meaningfully enhance the system's ability to move power to other markets. Reese Affidavit, ¶ 7.

D. Third Factor

The third indicator addresses power flows. PSE determined that, for each of the distribution facilities identified in Appendix A, power flows into, and rarely out of, its local distribution system. In this regard, PSE examined the third indicator (power flows) in conjunction with the fourth indicator (transfer to other markets). In other words, PSE

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interpretations of the first, fifth and seventh distribution indicators are also dependent on the characteristics of PSE's entire electric system.

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considered such power flows in relation to whether such power was transferred to other markets (i.e., the fourth indicator). PSE's local distribution system extends throughout the greater Puget Sound area. PSE's 230 kV lines serve to integrate PSE's local distribution system, but have been classified as transmission due to other factors in the seven-part test. Reese Affidavit, ¶¶ 7, 8 and 9.

The phrase "into local distribution systems" raises the question of whether the flow is unidirectional in nature, (i.e., to PSE retail load rather than to another market). As determined by PSE's power flow analysis, PSE states that power on radial and locally looped facilities flows directly to local loads, without re-entering the transmission network at some other point to reach another market. In Whatcom County, for example, local generation can cause power to flow from one portion of PSE's local distribution system to another portion of PSE's local distribution system, but not to other markets. Reese Affidavit, ¶¶ 8, 9 and 11.

E. Fourth Factor

The fourth indicator considers whether power that enters a local distribution system is reconsigned or transported on to some other market. In the case of the distribution facilities identified in Appendix A, the facilities PSE identifies as distribution facilities do not reconsign or transport power to other markets.

Other markets in the context of the seven-factor test refers to wholesale bulk power locations where there are multiple wholesale buyers and sellers. PSE considered high voltage lines used to move power between markets, such as power system interties, to be transmission facilities. Powerflow studies were used to identify other system facilities that give meaningful support to wheeling transactions between markets. Reese Affidavit, ¶¶ 6, 8 and 9.

Applying this indicator, PSE states that as determined by PSE's power flow analysis, PSE's 115 kV facilities were classified as facilities not providing meaningful support to

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wheeling transaction to other markets.[3] Therefore, as applied, PSE argues that this indicator supports PSE's classification of radial and locally looped systems as distribution. Reese Affidavit, ¶¶ 6, 8 and 9.

F. Fifth Factor

This indicator considers whether power entering a local distribution system is consumed in a comparatively restricted geographical area. The Petition states that all the distribution facilities listed in Exhibit A are distribution facilities in relation to this consideration. As with the first and seventh indicators, PSE viewed this indicator in the context of the Company's electrical system and retail load within the greater Puget Sound area. When power enters PSE's local distribution system, it is consumed within the corresponding geographic area. In contrast, PSE treated transmission facilities as lines that provide pathways for power that is not necessarily consumed within the geographical area served at retail by PSE and corresponding to PSE's local distribution system. Reese Affidavit, ¶ 8.

G. Sixth Factor

The sixth factor looks to whether meters are based at the transmission/local distribution interface to measure flows into the local distribution system. Various power metering devices are used throughout PSE's system, not exclusively limited to transmission-distribution interfaces. However, PSE states that each of the facilities identified as distribution

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[3] An exception to this classification is PSE's 115 kV Anderson Canyon-Beverly Line. This line was classified as transmission because it is non-radial in nature, connects commercial markets and has traditionally and contractually been used as part of PSE's cross-Cascade mountain range transmission capacity to access, for example, the Mid-Columbia wholesale power market.

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facilities in Appendix A are distribution facilities under this factor because each of these facilities has such transmission-distribution interface metering. Reese Affidavit, ¶ 10.

H. The Seventh Factor

The seventh factor addresses whether the facilities will be of reduced voltage. As a practical matter, PSE states that it classified facilities with an operating voltage of 230 kV and above as transmission facilities, because such facilities connect PSE's system to the bulk transmission grids of other utilities, and support transfers between regional markets. Similarly, PSE considered facilities operating at 34 kV or less as inherently distribution facilities and incapable of meaningful transmission between markets. Other facilities, primarily 115 kV facilities, merited a more detailed study of such facilities' function and purpose. Reese Affidavit, ¶¶ 6, 7 and 8.[4]

In this regard, FERC Order 888, and more specifically the seven-factor test, provides a process to differentiate between the transmission and distribution facilities. PSE considered "reduced voltage" as a term relative to its system and customer load characteristics. In that respect, as distances between energy sources and loads increase, lower voltages are not efficient at distributing power to customers. The size of a customer's load, or other economic considerations, may drive the need for higher distribution line voltages. Reese Affidavit, ¶¶ 6, 7 and 8.

III. ACCOUNTING TREATMENT

PSE requests that, if the Commission adopts PSE's proposed classification, the Company would account for such classification by making adjustments to its Electric Plant Chart of Accounts. Under WAC 480-100-031, this Commission utilizes the "'uniform system

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[4] See footnote three above.

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of accounts'" applicable to Class A and B electric utilities published by [FERC]." Under the FERC's Uniform System of Accounts, 18 C.F.R. Part 101, FERC requires utilities to classify and report the original cost of the utility's transmission and distribution plant. For transmission plant facilities, FERC requires the utility to report miscellaneous power plant equipment, land and land rights, structures and improvements, station equipment towers and structures, poles and fixtures, overhead conductors and devices, underground conduit, underground conductors and devices and roads and trails, each of which is used in connection with transmission operations or purposes or is used primarily as transmission facilities. See Sections 350-359 of Part 101. Likewise, under FERC's Uniform System of Accounts, utilities are required to report distribution facilities such as land and land rights, structures and improvements, station equipment, storage battery equipment, poles, towers and fixtures, overhead conductors and devices, underground conduit, underground conductors and devices, each of which is used in connection with distribution operations or distribution purposes. See Sections 360-369 of Part 101. PSE states that if PSE's proposed classification of transmission and distribution was adopted by the Commission, PSE would seek to report its transmission and distribution plant to FERC under and in light of such adoption by the Commission.

With regard to its reporting requirements to this Commission, PSE makes its reports concerning its transmission and distribution plant to this Commission in its semiannual commission basis and annual reports. Pursuant to WAC 480-100-031(5), PSE's annual report to this Commission consists of PSE's FERC Form No. 1. PSE proposes that if its proposed classification of transmission and distribution facilities was adopted by the Commission, PSE would, commencing from the date of Commission's order, report its transmission and distribution plant in its annual report (and PSE's semiannual commission basis reports) under and in light of such adoption by the Commission..

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IV. DECLARATORY ORDER

A declaratory order by the Commission adopting PSE's proposed classifications is appropriate in this case. By authority of WAC 480-09-230 and RCW 34.05.240(1), the Commission may enter a declaratory order upon a showing:

(a) That uncertainty necessitating resolution exists;

(b) That there is actual controversy arising from the uncertainty such that a declaratory order will not be merely an advisory opinion;

(c) That the uncertainty adversely affects the petitioner;

(d) That the adverse effect of uncertainty on the petitioner outweighs any adverse effects on others or on the general public that may likely arise from the order requested; and

(e) That the petition complies with any additional requirements established by the agency under subsection (2) of this section.

The declaratory order requested by PSE in its Petition meets these requirements, as set forth below.[5]

Uncertainty Necessitating Resolution: The uncertainty to be resolved by this Order is the precise demarcation between PSE transmission and distribution facilities to be applied in the future to reports to this Commission and to FERC. As to the jurisdictional significance of such distinctions, FERC invites proposals filed by public utilities under the Federal Power Act to classify transmission and distribution facilities, and cost allocations associated therewith. However, this Commission must first speak to the issue. Indeed, FERC recognized that state

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[5] The Commission has not established additional requirements under RCW 34.05.240(1)(e), but rather requires that petitions for declaratory order comply with the remaining subsections of RCW 34.05.240(1). See RCW 34.05.240(2); WAC 480-09-230.

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determination of its jurisdictional boundaries under and in light of the seven-factor test was a necessary prerequisite to federal consideration of such questions:

> [A]s a prerequisite to filing transmission/local distribution facility classifications and/or cost allocations with [FERC], utilities *must* consult with their state regulatory authorities.

Order 888-A, at 30,336 (emphasis added).

Actual Controversy Arising From the Uncertainty Such That a Declaratory Order Will Not Be Merely an Advisory Opinion: The controversy arises from uncertainty as to which of PSE's facilities are transmission facilities and which are distribution facilities under and in light of the seven-factor test promulgated by FERC in Order 888.

The Uncertainty Adversely Affects the Petitioner: The uncertainty adversely affects PSE in that, absent resolution thereof, there is uncertainty as to whom PSE owes certain regulatory responsibilities determined under and in light of the seven-factor test promulgated by FERC in Order 888. In this regard, FERC said:

> We also believe it is important to develop mechanisms to avoid regulatory conflict and to help provide certainty to utilities as to which regulator has jurisdiction over which facilities.

Order 888, at 31,783.

The Adverse Effect of Uncertainty on the Petitioner Outweighs any Adverse Effects on Others or on the General Public That May Likely Arise From the Order Requested: Resolution of the questions raised in this petition will not result in any adverse effect on others or the general public. The public interest is served by clarification of

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regulatory jurisdiction of the Commission, and of FERC, under and in light of the seven-factor test promulgated by FERC in Order 888.[6]

V. FINDINGS OF FACT

The Commission finds:

1. PSE is a public service company furnishing electric and gas service primarily in the greater Puget Sound region of the State of Washington and is subject to the regulatory authority of the Commission as to its rates, service, facility, and practices.

2. On January 2, 2001, PSE filed with the Commission a Petition for a Declaratory Order and Accounting Order regarding the classification of certain facilities and accounting treatment consistent therewith.

3. PSE's proposed classification of its facilities, as shown in Appendix A of this Order, and PSE's proposed accounting procedures consistent with such classification is reasonable, in the public interest and should be approved.

VI. ORDER

The Commission Orders:

1. THE COMMISSION DECLARES that PSE's proposed classification of its facilities as shown in Appendix A is reasonable and in the public interest; and

2. Authorization is hereby given to PSE to reflect such classification in its accounts and reports to this Commission.

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[6] PSE further states that adoption of PSE's proposed classifications would have no effect on others or the general public during the period of rate stability set forth in the Merger Order. PSE proposes that at the time of PSE's next general rate case, and to the extent such classifications are addressed in such a proceeding, PSE would not propose that the different classes of customers experience any impacts that arise solely from any change in the methodology for classification of facilities resulting from this Petition.

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3. The Commission retains jurisdiction to effectuate the provisions of this Order.

DATED at Olympia, Washington, and effective this _____ day of _____.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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APPENDIX A

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
3RD AC TRANS LINE	500	Oregon	N	N	N	N	N	N	N	Y	Transmn
BROADVIEW S Y-TOWNSEND A LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
BROADVIEW S Y-TOWNSEND B LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 3 TO S.Y.	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 4 TO S.Y.	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP S Y-BROADVIEW A LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP S Y-BROADVIEW B LINE	500	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 1 TO S.Y.	230	Montana	N	N	N	N	N	N	N	Y	Transmn
COLSTRIP 2 TO S.Y.	230	Montana	N	N	N	N	N	N	N	Y	Transmn
BPA B'HAM-SEDRO WOOLLEY(BPA OWNED)	230	Whatcom Co	N	N	N	N	N	N	N	Y	Transmn
NORTH INTERTIE TRANSM LINE (SKAGIT)	230	Skagit Co	N	N	N	N	N	N	N	Y	Transmn
BPA CUSTER-MURRAY (SEDRO TAP)	230	Skagit Co	N	N	N	N	N	N	N	Y	Transmn
SEDRO WOOLEY-MARCH PT 230KV LN	230	Skagit Co	N	Y	Y	Y	Y	N	N	Y	Transmn
SEDRO-SCL BOTHELL	230	Skagit Co	N	N	N	N	N	N	N	Y	Transmn
HORSE RANCH TAP OF BPA MONROE-SNOHOMISH #1	230	Snohomish Co	N	N	N	N	N	N	N	Y	Transmn
BOTHELL-SAMMAMISH	230	King Co	N	N	N	N	N	N	N	Y	Transmn
MONROE-SAMMAMISH(+SNOKING TAP)	230	King Co	N	N	N	N	N	N	N	Y	Transmn
SAMM-MAPLE VALLEY #1	230	King Co	N	N	N	N	N	N	N	Y	Transmn
MAPLE VALLEY - TALBOT #1	230	King Co	N	N	N	N	N	N	N	Y	Transmn
MAPLE VALLEY - TALBOT #2	230	King Co	N	N	N	N	N	N	N	Y	Transmn
TALBOT - BERRYDALE #3	230	King Co	N	Y	Y	Y	Y	N	N	Y	Transmn
TALBOT-O'BRIEN #3 230KV LINE	230	King Co	N	N	N	N	N	N	N	Y	Transmn.
CHRISTOPHER-O'BRIEN #4	230	King Co	N	N	N	N	N	N	N	Y	Transmn
BPA COVINGTON-WHITE RIVER NO. 1	230	King Co	N	N	N	N	N	N	N	Y	Transmn
TRANSM LINE - WHITE RIVER - OLYMPIA (BPA)	230	Pierce Co	N	N	N	N	N	N	N	Y	Transmn
ROCKY REACH-WHITE RIVER	230	Chelan Co	N	N	N	N	N	N	N	Y	Transmn
TAUNTON - KITTITAS (GRANT)	115	Grant Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - WHIDBEY #1	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - WHIDBEY #2	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SO WHIDBEY - LANGLEY	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHIDBEY - GREENBANK #1	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHIDBEY - GREENBANK #2	115	Island Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FAIRMOUNT-IRONDALE	115	Jefferson Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORT TOWNSEND #1	115	Jefferson Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
SHINE - IRONDALE	115	Jefferson Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ANDERSON CANYON-BEVERLY LINE	115	King Co	Y	N	N	N	N	Y	Y	N	Trasnmn
ASBURY - MIDWAY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE - FAIRWOOD	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE - KRAIN CORNER S.	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE - LAKE TRADITION #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BERRYDALE-LEA HILL	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEVERLY - COTTAGE BROOK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEVERLY-KENMORE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BOE. RENTON #1-BOE. RENTON #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BOEING-AUB#1 - BOEING-AUB #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CEDAR FALLS-SNOQUALMIE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CENTER TIE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CHRISTOPHER - STARWOOD	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CHRISTOPHER-BOEING AUBURN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CHRISTOPHER-MIDWAY 115KV LINE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
COTTAGE BROOK-MOORLANDS	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CUMBERLAND TAP	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
EASTSIDE - BELLEVUE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELEC HTS - KRAIN CRNR KING	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELLINGSON TAP	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
GREENWATER TAP	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KRAIN CORNER - ENUMCLAW	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KRAIN CORNER TAP	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - KENILWORTH	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - LAKE TRADITION	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - LOCHLEVEN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - MERCER ISLAND	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LAKESIDE - PHANTOM LAKE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - ASBURY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - MIDWAY #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - MIDWAY #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - NORMANDY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - SOUTH BREMERTON	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN-CHRISTOPHER #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN-CHRISTOPHER #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - CENTER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors							>10% Flow	Class Transmn
			#1	#2	#3	#4	#5	#6	#7		
SAMMAMISH - COTTAGE BROOK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - KENILWORTH	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LAKE TRADITION	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LAKESIDE #1	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LAKESIDE #2	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH - LOCHLEVEN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH-MOORLANDS #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMMAMISH-MOORLANDS #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SAMM-MOORLANDS #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SCL-TOLT-STILLWATER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLETON - O'BRIEN	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLETON-BOEING RENTON #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLETON-LAKESIDE	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHUFFLTON-LK TRADITION	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQ.- LK TRADITION #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQ.SW. - STILLWATER SUB.	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQ-LK. TRDTN. #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQUALMIE POWER HOUSE #1 PROJ	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOQUALMIE POWER HOUSE #2 PROJ	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
STARWOOD - MIDWAY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
STARWOOD - TIDEFLATS	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
STILLWATER SUB-COTTAGE BROOK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - ASBURY	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - BERRYDALE #3	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - CHRISTOPHER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - LAKESIDE #1	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - LAKESIDE #2	115	King Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
TALBOT - O'BRIAN #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-BERRYDALE #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-BOEING RENTON #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-LAKE TRADITION #1-S C	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TALBOT-O'BRIEN #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - 115KV CHRISTOPHER-WEYERHAEUSER	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - SNOQUALMIE LIGHT - N C	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - SNOQUALMIE POWER - S C	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - TALBOT HILL - MERCER ISLAND	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - TALBOT-LAKE TRADITION #2-S C	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors							>10% Flow	Class Transmn
			#1	#2	#3	#4	#5	#6	#7		
TRANSM LINE - WHITE RIVER - MIDWAY #3	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHITE RIVER - RENTON LIGHT	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHITE RIVER #1	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TWIN FALLS - HYAK	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVE - STARWOOD	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - O'BRIEN #2	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-LEA HILL	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-O'BRIEN #1	115	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-RENTON POWER 55KV LINE	55	King Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BAINBRIDGE TAP	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BPA KITSAP - NAVAL YARD (BANGOR)	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BREMERTON - FOSS CORNER	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BREMERTON - NAVY YARD TIE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BREMERTON-KEYPORT 115KV LINE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FOSS CORNER - SALSBURY #1	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FOSS CORNER-KEYPORT 115KV LINE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FOSS CORNER-MURDEN COVE	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP - NAVY YARD (BPA)	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP - VALLEY JUNCTION	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP-SOUTH BREMERTON NO.1	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
KITSAP-SOUTH BREMERTON NO.3	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
O'BRIEN - SOUTH BREMERTON	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
S BREMERTON - BREMERTON	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
S.BREMERTON-FERNWOOD	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SALSBURY CBL-SHINE HEIGHTS CBL	14.5	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SO. BREM - VALLEY JUNCTION	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
VALLEY JUNCTION - FOSS CORNER	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CASCADE - CLE ELUM	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CLE ELUM - HYAK	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CLE ELUM - KITTITAS	115	Kitsap Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TONO-BLUMAER (LEWIS)	115	Lewis Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TONO-OLYMPIA (LEWIS)	115	Lewis Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ALDERTON - FREDERICKSON #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELECT.HEIGHTS-BOEING PUYALLUP	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELECTRON - ELECTRON HEIGHTS	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
FREDERICKSON - ST. CLAIR	115	Pierce Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
ST CLAIR - FERN HILL	55	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
TACOMA POWER	55	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHITE RIVER - FERN HILL	55	Pierce Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
TRANSM LINE - WHT.RVR.-ELECTRON HEIGHTS #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - ALDERTON #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - ALDERTON #3	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER GEN - WHITE RIVER	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-ELECT HTS#1	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-KRAIN CORNER	55	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER-ST CLAIR 115KV	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RVR-BOE.AUBURN #2	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHT.RVR.-ALDERTON #4	115	Pierce Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BAKER-SEDRO WOOLLEY #1 PROJECT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BAKER-SEDRO WOOLLEY #2-PROJECT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEAVER LAKE - MARCH POINT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BEVERLY PARK-BEAVER LAKE	115	Skagit Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
BPA B'HAM-SEDRO WOOLLEY(BPA OWNED)	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BURROWS BAY - FIDALGO	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
CONCRETE	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
LOWER BAKER PROJECT	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - REFINERY #1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT - REFINERY #2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT TO TEXACO WEST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT-BURROWS BAY 1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT-BURROWS BAY 2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
MARCH PT-TEXACO EAST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY - MARCH POINT #1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY - MARCH POINT #2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY - MT VERNON #2	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY-MT VERNON #1	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO WOOLLEY-TEXACO EAST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SEDRO-WOOLLEY-BHAM#3	115	Skagit Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SEDRO-WOOLLEY-BHAM#4	115	Skagit Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
SHANNON 21 KOMA KULSHAN	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TEXACO WEST TO TEXACO EAST	115	Skagit Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SNOHOMISH - BEVERLY #4 (Facilities on BPA Lines)	115	Snohomish Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BLUMAER - ST CLAIR	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BPA - OLYMPIA #1	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	FERC Seven Distribution Factors #1	#2	#3	#4	#5	#6	#7	>10% Flow	Class Transmn
BPA - OLYMPIA #2	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ELECTRON HEIGHTS-BLUMAER	115	Thurston Co	Y	N	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - AIRPORT	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - PLUM STREET	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - ST CLAIR #1	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - ST CLAIR #2	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - WEST OLY #2	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
OLYMPIA - WEST OLYMPIA #1	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PLUM ST - PLEASANT GLADE	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PLUM ST - WEST OLYMPIA	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ST CLAIR - PLEASANT GLADE	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TONO OLY - TONO BLMR	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITE RIVER - OLYMPIA	115	Thurston Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ARCO CENTRAL - ARCO NORTH	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ARCO CENTRAL-ARCO SOUTH	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - BPA #2	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - G E P A C	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - O P C #1	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM - O P C #2	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM-BPA #3	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
BELLINGHAM-KENDALL	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ENSERCH-BELLINGHAM #1 115KV LN	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
ENSERCH-BELLINGHAM #2 115KV LN	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
NOOKSACK-KENDALL	55	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORTAL WAY - ARCO NORTH	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORTAL WAY-ARCO CENTRAL	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
PORTAL WAY-BELLINGHAM	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SHANNON 21 KOMA KULSHAN	34.5	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SUMAS-KENDALL	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
SUMAS-LYNDEN	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TERRELL - BELLINGHAM NO. 1 115KV	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
TERRELL SUB-ARCO SOUTH SUB	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
UPPER BAKER	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHATCOM NO. 1 (LYN-BPA-BHM)	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.
WHITEHORN - ARCO CEN SUB	115	Whatcom Co	Y	Y	Y	Y	Y	Y	Y	N	Distrib.

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
BPA-GARRISON SUBSTATION	500	Montana	Transmission
COLSTRIP 3&4 TRANS.SUB(@PLANT)	500	Montana	Transmission
COLSTRIP TRANS.SWITCH YARD	500	Montana	Transmission
BROADVIEW TRANS.SWITCH YARD	500	Montana	Transmission
COLSTRIP 1&2 TRANS.SUB(@PLANT)	230	Montana	Transmission
3RD AC LINE SUBSTATION	500	Montana	Transmission
BPA - PAUL SUBSTATION	500	Lewis County	Transmission
PORTAL WAY SUBSTATION-230 kV	230	Whatcom County	Transmission
MARCH POINT SWITCH STATION-230 kV	230	Skagit County	Transmission
SEDRO WOOLLEY SWITCH STATION-230 kV	230	Skagit County	Transmission
HORSE RANCH SUBSTATION	230	Snohomish County	Transmission
BERRYDALE SW STATION-230 kV	230	King County	Transmission
CHRISTOPHER SUBSTATION-230 kV	230	King County	Transmission
O'BRIEN SUBSTATION	230	King County	Transmission
SAMMAMISH SUBSTATION-230 kV	230	King County	Transmission
TALBOT HILL SUBSTATION-230 kV	230	King County	Transmission
CASCADE SUBSTATION-230 kV	230	Kittitas County	Transmission
WHITE RIVER - 230 KV SUB	230	Pierce County	Transmission
TAUNTON	115	Adams County	Distribution
CLOVER VALLEY SUBSTATION	115	Island County	Distribution
FREELAND SUBSTATION	115	Island County	Distribution
GREENBANK SUBSTATION	115	Island County	Distribution
HILLCREST SUBSTATION	115	Island County	Distribution
SOUTH WHIDBEY GEN STN	115	Island County	Distribution
SWANTOWN SUBSTATION	115	Island County	Distribution
WHIDBEY	115	Island County	Distribution
BPA - FAIRMOUNT SUBSTATION -PSE Facilities	115	Jefferson County	Distribution
IRONDALE SUBSTATION	115	Jefferson County	Distribution
KEARNEY ST SUBSTATION	115	Jefferson County	Distribution
QUILCENE SUBSTATION	115	Jefferson County	Distribution
ASBURY SUBSTATION	115	King County	Distribution
AVONDALE SUBSTATION	115	King County	Distribution
BARNABIE CABLE STN	115	King County	Distribution
BELMORE SUBSTATION	115	King County	Distribution
BERRYDALE SW STATION-115 kV	115	King County	Distribution
BLACK DIAMOND SUBSTATION	115	King County	Distribution
BOEING AUBURN #1 SUBSTATION	115	King County	Distribution
BOEING AUBURN #2 SUBSTATION	115	King County	Distribution
BOEING RENTON #1 SUBSTATION	115	King County	Distribution
BOEING-RENTON #2 SUBSTATION	115	King County	Distribution
BOW LAKE SUBSTATION	115	King County	Distribution
BPA COVINGTON SUBSTATION	115	King County	Distribution
BRIDLE TRAILS SUBSTATION	115	King County	Distribution
CAMBRIDGE SUBSTATION	115	King County	Distribution
CENTER SUBSTATION	115	King County	Distribution
CHRISTOPHER SUBSTATION-115 kV	115	King County	Distribution
CLYDE HILL SUBSTATION	115	King County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
COLLEGE SUBSTATION	115	King County	Distribution
COTTAGE BROOK SUBSTATION	115	King County	Distribution
COVE TERMINAL STATION	115	King County	Distribution
DES MOINES SUBSTATION	115	King County	Distribution
EARLINGTON SUBSTATION	115	King County	Distribution
EAST VALLEY SUBSTATION	115	King County	Distribution
EASTGATE SUBSTATION	115	King County	Distribution
ENATAI TERMINAL STATION	115	King County	Distribution
EVERGREEN SUBSTATION	115	King County	Distribution
FAIRWOOD SUBSTATION	115	King County	Distribution
FALCON SUBSTATION	115	King County	Distribution
FLOOD TERMINAL STATION	115	King County	Distribution
GRADY SUBSTATION	115	King County	Distribution
HARVEST SUBSTATION	115	King County	Distribution
HIGHLANDS SUBSTATION	115	King County	Distribution
HOBART SUBSTATION	115	King County	Distribution
HOLLYWOOD SUBSTATION	115	King County	Distribution
HOUGHTON SUBSTATION	115	King County	Distribution
INGLEWOOD SUBSTATION	115	King County	Distribution
KENILWORTH SUBSTATION	115	King County	Distribution
KENMORE SUBSTATION	115	King County	Distribution
KENT SUBSTATION	115	King County	Distribution
KITTS CORNER SUBSTATION	115	King County	Distribution
KLAHANNIE SUBSTATION	115	King County	Distribution
KRAIN CORNER SUBSTATION-115 kV	115	King County	Distribution
LAKE LEOTA SUBSTATION	115	King County	Distribution
LAKE TRADITION SUBSTATION	115	King County	Distribution
LAKE WILDERNESS SUBSTATION	115	King County	Distribution
LAKESIDE SWITCH STATION	115	King County	Distribution
LAKOTA SUBSTATION	115	King County	Distribution
LEA HILL SUBSTATION	115	King County	Distribution
LIQUID AIR SUBSTATION	115	King County	Distribution
LOCHLEVEN SUBSTATION	115	King County	Distribution
M STREET SUBSTATION	115	King County	Distribution
MANHATTAN SUBSTATION	115	King County	Distribution
MAPLEWOOD SUBSTATION	115	King County	Distribution
MARINE VIEW SUBSTATION	115	King County	Distribution
MEDINA SUBSTATION	115	King County	Distribution
MERIDETH SUBSTATION	115	King County	Distribution
METRO - RENTON (PROPOSED)	115	King County	Distribution
MIDLAKES SUBSTATION	115	King County	Distribution
MIDWAY SWITCH STATION	115	King County	Distribution
MIRRORMONT SUBSTATION	115	King County	Distribution
MOORLANDS SUBSTATION	115	King County	Distribution
NELSEN CABLE STATION	115	King County	Distribution
NORKIRK SUBSTATION	115	King County	Distribution
NORPAC SUBSTATION	115	King County	Distribution
NORTH BELLEVUE SUBSTATION	115	King County	Distribution
NORTH BOTHELL SUBSTATION	115	King County	Distribution
NORTHRUP SUBSTATION	115	King County	Distribution
NORWAY HILL SUBSTATION	115	King County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
O'BRIEN SUBSTATION	115	King County	Distribution
OLYMPIC RENTON SUBSTATION	115	King County	Distribution
ORCHARD SUBSTATION	115	King County	Distribution
ORILLIA SUBSTATION	115	King County	Distribution
OSCEOLA SUBSTATION	115	King County	Distribution
PACCAR SUBSTATION	115	King County	Distribution
PEASLEY CANYON SUBSTATION	115	King County	Distribution
PINE LAKE SUBSTATION	115	King County	Distribution
PIPE LAKE SUBSTATION	115	King County	Distribution
QUENDALL TERMINAL STATION	115	King County	Distribution
REDMOND SUBSTATION	115	King County	Distribution
REDONDO SUBSTATION	115	King County	Distribution
RENTON JUNCTION SUBSTATION	115	King County	Distribution
ROBINSON PT TERMINAL STATION	115	King County	Distribution
ROLLING HILLS SUBSTATION	115	King County	Distribution
ROSE HILL SUBSTATION	115	King County	Distribution
S DES MOINES TERMINAL STATION	115	King County	Distribution
SAHALEE SUBSTATION	115	King County	Distribution
SAMMAMISH SUBSTATION-115 kV	115	King County	Distribution
SEQUOIA SUBSTATION	115	King County	Distribution
SHUFFLETON @ PLANT	115	King County	Distribution
SHUFFLETON SUBSTN STORAGE-115 kV	115	King County	Distribution
SKYKOMISH SUBSTATION	115	King County	Distribution
SNOQUALMIE #1 @ PLANT	115	King County	Distribution
SNOQUALMIE #2 @ PLANT	115	King County	Distribution
SNOQUALMIE SUBSTATION	115	King County	Distribution
SNOQUALMIE SW STATION	115	King County	Distribution
SOOS CREEK SUBSTATION	115	King County	Distribution
SOUTH BELLEVUE SUBSTATION	115	King County	Distribution
SOUTHCENTER SUBSTATION	115	King County	Distribution
SPIRITBROOK SUBSTATION	115	King County	Distribution
STARWOOD SWITCH STATION	115	King County	Distribution
STILLWATER SWITCH STATION	115	King County	Distribution
SWEPTWING SUBSTATION	115	King County	Distribution
TALBOT HILL SUBSTATION-115 kV	115	King County	Distribution
TUKWILA CABLE STATION	115	King County	Distribution
TWIN FALLS SWITCHING STATION	115	King County	Distribution
VASHON ISLAND	115	King County	Distribution
VICTORIA PARK	115	King County	Distribution
VITULLI SUBSTATION	115	King County	Distribution
WEST CAMPUS	115	King County	Distribution
WEST ISSAQUAH	115	King County	Distribution
BPA - KITSAP SUBSTATION-PSE Facilities	115	Kitsap County	Distribution
BREMERTON SUBSTATION	115	Kitsap County	Distribution
CENTRAL KITSAP SUBSTATION	115	Kitsap County	Distribution
CHRISTENSEN'S CORNER SUBSTATION	115	Kitsap County	Distribution
COMMAND PT.TERMINAL STATION	115	Kitsap County	Distribution
EAST PORT ORCHARD SUBSTATION	115	Kitsap County	Distribution
FOSS CORNER SUBSTATION	115	Kitsap County	Distribution
KEYPORT SUBSTATION	115	Kitsap County	Distribution
LONG LAKE SUBSTATION	115	Kitsap County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
MILLER BAY SUBSTATION	115	Kitsap County	Distribution
PORT MADISON SUBSTATION	115	Kitsap County	Distribution
SILVERDALE SUBSTATION	115	Kitsap County	Distribution
SINCLAIR SUBSTATION	115	Kitsap County	Distribution
SOUTH BREMERTON SUBSTATION	115	Kitsap County	Distribution
SOUTH KEYPORT SUBSTATION	115	Kitsap County	Distribution
TRACYTON	115	Kitsap County	Distribution
VALLEY JUNCTION	115	Kitsap County	Distribution
CASCADE SUBSTATION-115 kV	115	Kittitas County	Distribution
CLE ELUM SUBSTATION	115	Kittitas County	Distribution
EASTON SUBSTATION	115	Kittitas County	Distribution
HYAK SUBSTATION	115	Kittitas County	Distribution
KITTITAS SUBSTATION	115	Kittitas County	Distribution
WOLDALE	115	Kittitas County	Distribution
TONO	115	Lewis County	Distribution
ALDERTON SUBSTATION	115	Pierce County	Distribution
BOEING PUYALLUP SUBSTATION	115	Pierce County	Distribution
BONNEY LAKE SUBSTATION	115	Pierce County	Distribution
CEDARHURST SUBSTATION	115	Pierce County	Distribution
DUPONT SUBSTATION	115	Pierce County	Distribution
ELECTRON HEIGHTS SWITCH STATION-115 kV	115	Pierce County	Distribution
ELECTRON TRANSMISSION STATION	115	Pierce County	Distribution
FAIRCHILD SUBSTATION	115	Pierce County	Distribution
FREDERICKSON SUBSTATION	115	Pierce County	Distribution
FRUITLAND SUBSTATION	115	Pierce County	Distribution
HEMLOCK SUBSTATION	115	Pierce County	Distribution
KAPOWSIN SUBSTATION	115	Pierce County	Distribution
LAKE TAPPS-115 kV	115	Pierce County	Distribution
ORTING SUBSTATION	115	Pierce County	Distribution
RHODES LAKE SUBSTATION	115	Pierce County	Distribution
SHAW SUBSTATION	115	Pierce County	Distribution
SUMNER SUBSTATION	115	Pierce County	Distribution
WHITE RIVER -115 KV SUB	115	Pierce County	Distribution
WOODLAND	115	Pierce County	Distribution
ANACORTES SUBSTATION	115	Skagit County	Distribution
BAKER RIVER LWR @ PLT	115	Skagit County	Distribution
BAKER RIVER LWR SW, COMMON	115	Skagit County	Distribution
BEAVER LAKE S W STATION	115	Skagit County	Distribution
BURROWS BAY SUBSTATION	115	Skagit County	Distribution
FREDONIA SUBSTATION	115	Skagit County	Distribution
HAMILTON SUBSTATION	115	Skagit County	Distribution
MARCH POINT SWITCH STATION-115 kV	115	Skagit County	Distribution
MT VERNON SUBSTATION	115	Skagit County	Distribution
NORLUM SUBSTATION	115	Skagit County	Distribution
OLYMPIC-AVON SUBSTATION	115	Skagit County	Distribution
PETH'S CORNER SUBSTATION	115	Skagit County	Distribution
RITA STREET SUBSTATION	115	Skagit County	Distribution
RIVER BEND SUBSTATION	115	Skagit County	Distribution
SEDRO WOOLLEY SWITCH STATION-115 kV	115	Skagit County	Distribution
TEXACO EAST	115	Skagit County	Distribution
TEXACO WEST	115	Skagit County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
BEVERLY PARK SUBSTATION	115	Snohomish County	Distribution
HILTON LAKE SUBSTATION	115	Snohomish County	Distribution
BARNES LAKE SUBSTATION	115	Thurston County	Distribution
BLUMAER SUBSTATION	115	Thurston County	Distribution
BPA - OLYMPIA SUBSTATION	115	Thurston County	Distribution
CHAMBERS SUBSTATION	115	Thurston County	Distribution
DECATUR SUBSTATION	115	Thurston County	Distribution
LACEY SUBSTATION	115	Thurston County	Distribution
LUHR BEACH SUBSTATION-115 kV	115	Thurston County	Distribution
MCKINLEY SUBSTATION	115	Thurston County	Distribution
MOTTMAN SUBSTATION	115	Thurston County	Distribution
OLYMPIA BREWERY CO. SUBSTATION	115	Thurston County	Distribution
OLYMPIA SUBSTATION-115 kV	115	Thurston County	Distribution
PATTERSON SUBSTATION	115	Thurston County	Distribution
PRINE - FUTURE USE	115	Thurston County	Distribution
ROCHESTER SUBSTATION	115	Thurston County	Distribution
SOUTHWICK SUBSTATION	115	Thurston County	Distribution
ST CLAIR SUBSTATION-115 kV	115	Thurston County	Distribution
WEST OLYMPIA	115	Thurston County	Distribution
YELM	115	Thurston County	Distribution
ARCO CENTRAL SUBSTATION	115	Whatcom County	Distribution
ARCO-NORTH SUBSTATION	115	Whatcom County	Distribution
ARCO-SOUTH SUBSTATION	115	Whatcom County	Distribution
BAKER RIVER UPR @ PLT	115	Whatcom County	Distribution
BAKERVIEW SUBSTATION	115	Whatcom County	Distribution
BELLINGHAM SUBSTATION-115 kV	115	Whatcom County	Distribution
WHATCOM PUD SUBSTATION-PSE Facilities	115	Whatcom County	Distribution
BPA - BELLINGHAM SUBSTATION-PSE Facilities	115	Whatcom County	Distribution
BRITTON ROAD SUBSTATION	115	Whatcom County	Distribution
ENCOGEN STATION	115	Whatcom County	Distribution
ENSERCH SUBSTATION	115	Whatcom County	Distribution
ENTERPRISE PUD PUMP	115	Whatcom County	Distribution
HANNEGAN SUBSTATION	115	Whatcom County	Distribution
KENDALL SUBSTATION	115	Whatcom County	Distribution
LA BOUNTY SUBSTATION	115	Whatcom County	Distribution
LYNDEN SUBSTATION	115	Whatcom County	Distribution
NOOKSACK @ PLANT	115	Whatcom County	Distribution
NUGENT'S CORNER SUBSTATION	115	Whatcom County	Distribution
PORTAL WAY SUBSTATION-115 kV	115	Whatcom County	Distribution
SCHUETT SUBSTATION	115	Whatcom County	Distribution
SHANNON SUBSTATION-115 kV	115	Whatcom County	Distribution
SLATER SUBSTATION	115	Whatcom County	Distribution
SUMAS SUBSTATION	115	Whatcom County	Distribution
TERRELL	115	Whatcom County	Distribution
VAN WYCK SUB	115	Whatcom County	Distribution
VISTA	115	Whatcom County	Distribution
WATERFRONT	115	Whatcom County	Distribution
WHITEHORN	115	Whatcom County	Distribution
WOBURN STREET	115	Whatcom County	Distribution
PORT LUDLOW SUBSTATION	66	Jefferson County	Distribution
KRAIN CORNER SUBSTATION-55 kV	55	King County	Distribution

Transmission and Distribution Facilities

Facility Name	Voltage	Location	Class
SHUFFLETON SUBSTN STORAGE-55 kV	55	King County	Distribution
STEVENSON SWITCH STATION	55	King County	Distribution
ELECTRON HEIGHTS SWITCH STATION-55 kV	55	Pierce County	Distribution
FERN HILL SUBSTATION	55	Pierce County	Distribution
LAKE TAPPS-55 kV	55	Pierce County	Distribution
WHITE RIVER - 55 KV SUB	55	Pierce County	Distribution
MARCH POINT SWITCH STATION-55 kV	55	Skagit County	Distribution
SEDRO WOOLLEY SWITCH STATION-55 kV	55	Skagit County	Distribution
CAPITOL SUBSTATION	55	Thurston County	Distribution
LUHR BEACH SUBSTATION-55 kV	55	Thurston County	Distribution
OLYMPIA SUBSTATION-55 kV	55	Thurston County	Distribution
PLEASANT GLADE SUBSTATION	55	Thurston County	Distribution
PLUM STREET SUBSTATION	55	Thurston County	Distribution
ST CLAIR SUBSTATION-55 kV	55	Thurston County	Distribution
THURSTON	55	Thurston County	Distribution
BELLINGHAM SUBSTATION-55 kV	55	Whatcom County	Distribution
OLD TOWN SUBSTATION	55	Whatcom County	Distribution
SHANNON SUBSTATION-34.5 kV	34.5	Whatcom County	Distribution