BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Complainant,

v.

OLYMPIC PIPE LINE COMPANY, INC.,

Respondent.

DOCKET NO. TO-011472

STATUS REPORT ON STAFF DATA REQUESTS ADDRESSED IN STAFF'S MARCH 27 MOTION TO DISMISS

Since Staff's March 27, 2002 Motion to Dismiss was filed, Staff has communicated with Olympic Pipe Line Company (Olympic) representatives in efforts to get responsive discovery. This pleading is supplied to update the Commission on the events that have occurred since that Motion to Dismiss was filed.

The following Staff data requests are presented in the same order in which they were presented in Staff's Motion.

Staff Data Request No. 376:

At the close of business on April 1, 2002, Staff received a different version of Olympic's response to Staff Data Request No. 376. Mr. Colbo and Mr. Twitchell of Commission Staff have since discussed this response with Mr. Collins for Olympic.

Staff now believes it has the information it requested in this data request, in a usable form.

Staff Data Request Nos. 397, 405, and 414

On March 27, 2002, just as Staff's Motion to Dismiss was sent out in email, we received Olympic's response to Staff Data Request Nos. 397 and 414. These appear to be responsive.

Olympic has provided no response to Staff Data Request No. 405.

STATUS REPORT ON STAFF DATA REQUESTS ADDRESSED IN STAFF'S MARCH 27 MOTION TO DISMISS - 1

Staff Data Request No. 323

No change: Olympic has not provided the documents referenced in its earlier response to Staff Data Request No. 323.

Staff Data Request Nos. 339, 341, and 355

On March 29, 2002, Staff received Olympic's responses to Staff Data Request Nos. 339, 341 and 355. Olympic's response to Staff Data Request No. 339 appears to be responsive.

Olympic's response to No. 341 was not fully responsive to that request. Specific pricing information was not supplied. Olympic's response to No. 355 relies on its response to No. 341.

Staff followed up the same day. On March 29, 2002, Staff sent a letter to Olympic seeking a complete response to Staff Data Request No. 341. None has been received to date.

Staff Data Request Nos. 319, 345, 364, 400 and 401

No change: No further responses from Olympic to these Staff data requests have been received since Staff's Motion to Dismiss was filed.

DATED this 3rd day of April, 2002.

CHRISTINE O. GREGOIRE Attorney General

DONALD T. TROTTER Senior Counsel Washington Utilities and Transportation Commission (360) 664-1189

STATUS REPORT ON STAFF DATA REQUESTS ADDRESSED IN STAFF'S MARCH 27 MOTION TO DISMISS - 2