

**EXH. SEF-27  
DOCKETS UE-170033/UG-170034  
2017 PSE GENERAL RATE CASE  
WITNESS: SUSAN E. FREE**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-170033  
Docket UG-170034**

**FIFTEENTH EXHIBIT (NONCONFIDENTIAL) TO THE  
PREFILED REBUTTAL TESTIMONY OF**

**SUSAN E. FREE**

**ON BEHALF OF PUGET SOUND ENERGY**

**AUGUST 9, 2017**



Timothy J. Hogan  
Vice President  
Supply, Administration and  
Corporate Secretary

December 23, 1994

Mr. Steve McLellan, Secretary  
Washington Utilities and  
Transportation Commission  
P.O. Box 47250  
1300 S. Evergreen Park Drive S.W.  
Olympia, WA 98504-7250

Re: Docket UG-920781  
Washington Natural Gas Company's Accounting Order for  
Environmental Remediation Program/Quarterly Report  
July 1, 1994 through September 30, 1994  
Your Reference No. 6-1165

Dear Mr. McLellan:

Pursuant to the above-referenced Accounting Order, Washington Natural Gas Company ("Company") hereby submits its Quarterly Report for the period July 1, 1994 through September 30, 1994. The following sites are covered by the Quarterly Report: CERCLA Site - Tacoma, Washington; "A" Street Site - Tacoma, Washington; Everett Site - Everett, Washington; and Chehalis Site - Chehalis, Washington. Lastly, a discussion of developments in the insurance litigation is included.

CERCLA SITE -- TACOMA, WASHINGTON

Enclosed are copies of the monthly reports submitted to the Environmental Protection Agency concerning the activities of the CERCLA Site for the months of July, August and September, 1994. Also enclosed is a detailed breakdown of payments to third parties for CERCLA Site remediation expenses exclusive of attorney's fees and costs related to Company personnel, current as of September 30, 1994.

Remediation activities are expected to be substantially completed by the end of calendar 1994. The current clean up cost estimate, less recoveries from insurance settlements and third parties, totals \$27 million. This amount does not include attorney fees incurred in the insurance litigation nor interest.

"A" Street Site - Tacoma

- a. Upland Source Control. There has been no activity at this site during this period.
- b. WSDOT vs. WNG, federal. WNG is still awaiting a decision from the 9th Circuit on the appeal from the trial court's decision in favor of WNG.

- c. WSDOT vs. WNG, state. This action is stayed by court order pending the decision of the 9th Circuit in WSDOT vs. WNG, federal.
- d. Thea Foss Waterway. The City of Tacoma has completed round 1 of their sediment sampling program and the results are being analyzed to ascertain predominant contaminants in the Waterway.

Payments totalling \$808.73 were made during the period of July 1 through September 30, 1994 at these sites, exclusive of attorney fees.

Everett

WNG completed installation of several new monitoring wells and located three abandoned underground concrete holders at the site. Multiple samples of materials have been collected throughout the site and analyzed to determine the chemical constituents. This work is being performed as an Independent Cleanup Action in accordance with the Model Toxics Control Act.

From July 1 through September 30, 1994, a total of \$51,130.93 was spent at this site.

Chehalis

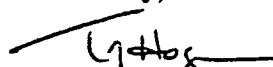
WNG solicited bids for the treatment and/or removal of approximately 500,000 gallons of contaminated sludge contained in the remnants of the former gas holder still situated at the site. As part of this project, the former gas holder will be demolished once the material inside has been properly addressed.

Payments totalling \$2,565 were paid during the period July 1 through September 30, 1994 in connection with this site.

INSURANCE LITIGATION UPDATE

The trial court's decision allowing the Company to recover its remediation costs for the CERCLA Site from certain insurers who provided comprehensive general liability coverage has been appealed. A briefing schedule has been established by the Washington State Court of Appeals.

Sincerely,

  
Timothy J. Hogan

enclosures

REMEDATION EXPENSES ASSOCIATED WITH THE TACOMA  
HISTORICAL COAL GASIFICATION SITE FOR 1994

DATE	PAYEE	PAYMENT AMOUNT	ACCRUED TOTAL	DESCRIPTION
07/25/94	JOSEPH SIMON & SONS	\$500.00		MONTHLY STORAGE RENTAL.
07/05/94	WILDER CONSTRUCTION	\$901,815.24		SEE FOOTNOTE 10.
07/06/94	ECHOCHEM, INC.	\$4,419.43		ECHOCHEM INC VALIDATES ANALYTICAL DATA DESCRIBED IN FOOTNOTE 9.
07/06/94	CHEM WASTE MANAGEMENT	\$59,430.85		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE.
07/14/94	TACOMA CITY TREASURER	\$41.27		PROVIDE ELECTRICAL SERVICE FOR MIXING PLANT.
07/14/94	EBASCO	\$151,875.80		SEE FOOTNOTE 7.
07/18/94	CHEM WASTE MANAGEMENT	\$6,777.05		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE.
07/18/94	PACIFIC TESTING LAB	\$1,352.00		PACIFIC TESTING LAB PERFORMS TEST FOR PHYSICAL CRITERIA.
07/19/94	DALTON OLMSTED	\$5,089.15		SEE FOOTNOTE 6.
07/19/94	DALTON OLMSTED	\$6,982.46		SEE FOOTNOTE 8.
07/21/94	CHEM WASTE MANAGEMENT	\$9,295.65		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE.
07/22/94	TILBURY CEMENT	\$41,772.25		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT.
07/29/94	TACOMA CITY TREASURER	\$1,068.71		PROVIDE ELECTRICAL SERVICE FOR MIXING PLANT.
07/29/94	WILDER CONSTRUCTION	\$629,618.62		SEE FOOTNOTE 10.
	JULY TOTAL	\$1,820,038.48	\$11,482,618.63	
08/02/94	BAKER TANKS	\$1,424.28		TANK RENTAL FOR WATER TREATMENT SYSTEM
08/03/94	CHEM WASTE MANAGEMENT	\$33,853.60		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE
08/04/94	TILBURY CEMENT	\$18,644.03		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
08/04/94	SOIL TECHNOLOGY	\$2,516.11		PHYSICAL SOIL TESTING
08/05/94	CHEM WASTE MANAGEMENT	\$42,683.13		OFFSITE DISPOSAL CHARGE FOR WASTE FROM SITE
08/05/94	HARBOR TECH SUPPLIES	\$56.63		PAYMENT FOR PURCHASE OF SUPPLIES FOR WATER TREATMENT SYSTEM
08/05/94	PACIFIC TESTING LAB	\$1,501.13		PACIFIC TESTING LAB PERFORMS TEST FOR PHYSICAL CRITERIA
08/05/94	NORTH CREEK ANALYTICA	\$12,661.00		SEE FOOTNOTE 9
08/09/94	HYGRADE	\$2,400.00		RENTAL FOR STORAGE AREA ACREAGE AT THE SITE
08/10/94	TACOMA CITY TREASURER	\$31.28		PROVIDE ELECTRICAL SERVICE FOR MIXING PLANT
08/16/94	CHEM WASTE MANAGEMENT	\$300.00		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE
08/16/94	BAKER TANKS	\$1,424.28		TANK RENTAL FOR WATER TREATMENT SYSTEM
08/18/94	EBASCO	\$144,247.44		SEE FOOTNOTE 7
08/19/94	DALTON OLMSTED	\$4,973.00		SEE FOOTNOTE 6
08/19/94	DALTON OLMSTED	\$4,397.43		SEE FOOTNOTE 8
08/24/94	TILBURY CEMENT	\$35,374.13		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
08/24/94	TACOMA CITY TREASURER	\$1,047.83		PROVIDE ELECTRICAL SERVICE FOR MIXING PLANT
08/25/94	JOSEPH SIMON & SONS	\$500.00		MONTHLY STORAGE RENTAL
08/26/94	WILDER CONSTRUCTION	\$443,876.05		SEE FOOTNOTE 10
08/30/94	TILBURY CEMENT	\$36,783.18		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
	AUGUST TOTAL	\$788,694.53	\$12,271,313.16	
09/02/94	AULT ELECTRIC	\$711.23		MISCELLANEOUS ELECTRICAL WORK AT THE SITE
09/07/94	WESTEC	\$4,309.83		FABRICATION OF MIXING PLANT
09/09/94	PACIFIC TESTING	\$4,072.88		PTL PERFORMS TEST FOR PHYSICAL CRITERIA
09/09/94	HYGRADE	\$2,400.00		RENTAL FOR STORAGE AREA ACREAGE AT THE SITE
09/12/94	TILBURY CEMENT	\$20,796.39		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
09/12/94	CHEM WASTE MANAGEMENT	\$2,205.55		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE
09/15/94	AGGREKO	\$957.57		ELECTRICAL GENERATOR RENTAL FOR WATER TREATMENT PLANT
09/19/94	TACOMA CITY TREASURER	\$1,153.01		PROVIDE ELECTRICAL SERVICE FOR MIXING PLANT
09/20/94	TILBURY CEMENT	\$15,437.24		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
09/22/94	WILDER CONSTRUCTION	\$440,676.24		SEE FOOTNOTE 10
09/22/94	ECHOCHEM INC	\$3,901.77		ECHOCHEM INC VALIDATES ANALYTICAL DATA DESCRIBED IN FOOTNOTE 9
09/22/94	DALTON OLMSTED	\$5,671.54		SEE FOOTNOTE 6
09/22/94	DALTON OLMSTED	\$2,472.00		SEE FOOTNOTE 8
09/25/94	JOSEPH SIMON AND SONS	\$500.00		MONTHLY STORAGE RENTAL
09/26/94	TILBURY CEMENT	\$12,630.19		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
09/27/94	CHEM WASTE MANAGEMENT	\$13,865.35		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE
09/27/94	BAKER TANKS	\$1,424.28		TANK RENTAL FOR WATER TREATMENT SYSTEM
09/28/94	TILBURY CEMENT	\$12,327.16		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
09/29/94	CHEM WASTE MANAGEMENT	\$54,487.40		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THE SITE
09/30/94	AULT ELECTRIC	\$366.71		MISCELLANEOUS ELECTRICAL WORK AT THE SITE
	SEPTEMBER TOTAL	\$600,366.34	\$12,871,679.50	