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.

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

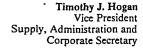
**PUGET SOUND ENERGY,** 

Respondent.

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

SUSAN E. FREE

ON BEHALF OF PUGET SOUND ENERGY





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: Dock

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.

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- 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

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

CHANGE STORM		PAYEE	PAYMENT AMOUNT	ACCRUED TOTAL	DRSCRIPTION
MARCH CONSTRUCTION   \$91,815.24   SERVICION   SERVIC	07/25/94		8500.00		
State   March   Marc	94	WILDER CONSTRUCTION	\$901,815.24		SEE FOOTHORF 10
COURT   COUR	4	ECHOCHEM, INC.	\$4,419.43		Thatter analytical range range and property
Through CITY TREASHER   1,1,17   SEP FORMING ELECTRICAL SERVICE FOR HIXINE PLANT.	4	CHEM WASTE MANAGEMENT	\$59,430.85		OPESITE DISDOCAL CUADOR SON WASHINGTON TO THE TOTAL OF STATE OF ST
SECOND	4	TACOMA CITY TREASURER	\$41.27		PROVIDE BLECHDIAL CEDITOR FOR MASIE FROM THE SITE.
ACCORDANCE   1972-10-10-10-10-10-10-10-10-10-10-10-10-10-	4	EBASCO	\$151,875.80		SEE FOOTNOTE 7
MACITY CIRSTIN DAS   \$1,32.00   PRINTED TESTING DAS   PRINTED TESTING DAS   PRINTED DAY   PRINTED	4	CHEM WASTE MANAGEMENT	\$6,777.05		OPESTITE DISPOSAL CHARGE BOB MACHE DESCRIPTION DESCRIPTION
MACING OLUSTED   55,081.46   SIE FORTHOUS   151 FOR PUBLICAL CAITEDIA.	Ž.	PACIFIC TESTING LAB	\$1,352.00		DACTET TECHNOTAL TRADESCON THE SITE.
CHING OLANGER   51,925.46   SIE COUNCIDE ELECTRON COURSE FOR ACTE TO HANDER PROPERTY	4	DALTON OLMSTED	\$5,089,15		SPE BOOTHOMS OF FERFORMS TEST FOR PHYSICAL CRITERIA.
TITABRY CORRECT   State   St	7	DALTON OLMSTED	\$6.982.46		CET COMMONT 0
TLIBURY CREATE   \$11,772.25   PRINCIPE STRONG CREEK FROM THE SITE.	7	CHEM WASTE MANAGEMENT	\$9,295,65		ORDSTAR PICTORS
THILDEN CONSTRUCTION   \$12,064,77   PROPERTY 10.	7	TILBURY CEMENT	\$41,772,25		DEPONITED TITLE OF THE FIRM THE SITE.
MINER CONSTRUCTION   \$4,225,116.4.2   MARK RENTAL FOR WATER TREATHER SYSTEM FROM HIXING PLANT.   \$1,420,018.4.4   \$11,426,416.4.5.3   MARK RENTAL FOR WATER TREATHER SYSTEM FROM HIXING PLANT.   \$1,420,018.4.4   \$11,426,416.4.3   MARKER TANKS TO BLAND FROM HIXING PLANT.   \$1,420,018.4.4   MARKER TANKS TO BLAND FROM HIXING PLANT FROM H	4	TACOMA CITY TREASURER	\$1.068.71		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT.
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CHARGE WARTER   St. 1.	4 4	SOII. TECHNOLOGY	\$18,644.03		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
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PACTECT TEATING LAB		UNDBOR TROTT CHARLET	\$42,683.13		OFFSITE DISPOSAL CHARGE FOR WASTE FROM SITE
NGETH CREEK MAALTICA   \$1,501.13   PACTECT TESTING LAB PERFORMS TEST FOR PHYSICAL CRITERIA   \$1,000.00   REPRODUCE 9   \$1,000.00   REPREDER 9   \$1,000.00   REPRODUCE 9   \$1	* 6	DACTET TECH SUPPLIES	\$56.63		PAYMENT FOR PURCHASE OF SUPPLIES FOR WATER TREATMENT EVENTS
STATEMENT   STAT	7	NODER CORDY AND AMEDIA	\$1,501.13		PACIFIC TESTING LAB PERFORMS TEST FOR PHYSICAL CRITTERIA
NECOMO CITY TREASURER   \$7,100.00   RENTAL POR STORAGE RARE A GRANDER PROMINE STITE STORAGE RAY MATCHER PROMINE STITE STAND CONTRIBED STANDS OF	7 6	HYGDADP	\$12,661.00		SEE FOOTNOTE 9
SALLAGE   SECONDARY   SALLAGE   SECONDARY   SALLAGE   SECONDARY   SALLAGE	. 9	TACOMA CITTO TOPRACTIPED	\$2,400.00		RENTAL FOR STORAGE AREA ACREAGE AT THE SITE
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STATE OF CHARGE   STATE   STEE POOTHORE	. 4	BAVED TANGE	\$300.00		OFFSITE DISPOSAL CHARGE FOR WASTE FROM THR STAFF
DALITON OLMSTED   \$4,197.40   SEE POOTNOTE 7	. 5	EBASCO	47, 424.28		TANK RENTAL FOR WATER TREATMENT SYSTEM
SEE FOOTWORD	4	DALTON OLMSTED	44.142.44		SEE FOOTNOTE 7
TILDURY CEMERT   \$1, 101 - 03   \$1, 101 - 0	4	DALTON OF METER	54,9/3.00		SEE FOOTNOTE 6
TIME RECTRIC CANSAGE   \$1,047.83   PRODUCES FINAL STG BLEND OF WATERIAL AND CEMENT HONOTHER STORAGE RENTAL STG BLEND OF WATERIAL AND CEMENT HONOTHER STORAGE RENTAL STG BLEND OF WATERIAL AND CEMENT HONOTHER STG. 13. 12. 12. 12. 13. 13. 15. 12. 12. 13. 13. 15. 12. 12. 13. 13. 15. 12. 12. 13. 13. 15. 12. 12. 13. 13. 15. 12. 12. 13. 13. 15. 12. 12. 13. 13. 15. 12. 12. 13. 15. 12. 13. 13. 15. 13. 15. 13. 13. 15. 13. 13. 15. 13. 13. 15. 13. 13. 13. 13. 13. 13. 13. 13. 13. 13	. 4	TILBURY CEMENT	44, 122, 43 42, 42, 42, 42, 43		SEE FOOTNOTE 8
NEWVIDE BLECTRICAL SERVICE FOR MIXING PLANT	4	TACOMA CITTY TREASTIBED	51.4/5,55¢		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
MONTHLY STORAGE RENTAL   SALUGATION   SALU	. 4	TOSEDH CIMON E CONS	\$1,047.83		PROVIDE BLECTRICAL SERVICE FOR MIXING PLANT
AULT ELECTRIC CRIENT   \$143.18   \$12.271.313.16   PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT AUGUST TOTAL   \$718.18   \$12.271.313.16   PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT   \$4.00.00   \$4.309.83   \$12.271.313.16   \$4.309.83   \$4	7	WILDED CONSTRUCTOR	00.000		MONTHLY STORAGE RENTAL
AULT ELECTRIC   \$316.783.18   PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT	7 5	TITOTE CONSINCTION	\$443,876.05		SEE FOOTNOTE 10
## AULT ELECTRIC \$711.23 #12.271.313.16  ## AULT ELECTRIC \$711.23 #12.271.313.16  ## RECTRIC \$7.11.23 #12.271.313.16  ## RECTRIC #1.02 #1.	-	ALLEDOKI CEMBAI	\$36.783.18		PRODUCES FINAL STC BLEND OF MATERIAL AND COMPANY
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PACIFIC TESTING	*	WESTRC	£2:11()		MISCELLANEOUS ELECTRICAL WORK AT THE SITE
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CHEM WASTE MANAGEMENT \$13,865.35  BAKER TANKS \$1,424.28  *11,424.28  *11,424.28  *12,327.16  CHEM WASTE MANAGEMENT \$54,487.40  AULT ELECTRIC \$366.71  SEPTEMBER TOTAL \$600.366.74	94		\$10 630 10		MONTHLY STORAGE RENTAL
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CHEM WASTE MANAGEMENT \$54,480.410 AULT ELECTRIC \$326.71 SEPTEMBER TOTAL \$600.365.44	4	TILBURY CEMENT	87: 424 / 15		TANK RENTAL FOR WATER TREATMENT SYSTEM
SEPTEMBER TOTAL \$560.365.41	94	CHEM WASTE MANAGEMENT	\$54.487.40		PRODUCES FINAL STC BLEND OF MATERIAL AND CEMENT
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14 h / 4 1 / K 1 /		SEPTEMBER TOTAL	\$600.366.34	\$12.871.679 50	MISCEDDANEGUS ELECTRICAL WORK AT THE SITE