

Exhibit No. 1912 (MLT-12)  
Docket No. TO-011472  
Witness: Maurice L. Twitchell

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

Washington Utilities and )  
Transportation Commission, )  
 )  
Complainant, )  
 )  
v. )  
 )  
Olympic Pipe Line Company, Inc., )  
 )  
Respondent )  
 )  
 )  
\_\_\_\_\_ )

**DOCKET NO. TO-011472**

**EXHIBIT OF**

**MAURICE L. TWITCHELL**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

**EXCERPT FROM THE DEPOSITION OF MR. TALLEY  
Tr. 1-5, 8-9**

May 24, 2002

WUTC DOCKET NO. TO-011472  
EXH. NO. 1912  
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BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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WASHINGTON UTILITIES AND ) Docket No. TO-011472  
TRANSPORTATION COMMISSION, )  
Complainant, )  
v )  
OLYMPIC PIPE LINE COMPANY, )  
INC., )  
Respondent. )

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DEPOSITION UPON ORAL EXAMINATION

OF

BOBBY J. TALLEY

1:13 p.m.

April 22, 2002

411 108th Avenue, N.E., Suite 1800

Bellevue, Washington

Barbara L. Nelson, CCR

Court Reporter

**COPY**

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5

6 ALSO PRESENT: MAURICE TWITCHELL  
7 BOB BATCH  
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I N D E X

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E X H I B I T S

EXHIBIT	DESCRIPTION:	PAGE:
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Number 3	3/27/02 E-mail from Mr. Brena	82
Number 4	4/4/02 Letter to Mr. Brena from Olympic FERC Counsel	82
Number 5	Codes for Green Sheets	82

1 MR. TROTTER: Let's be on the record. This  
2 is a deposition in the Commission Docket Number  
3 TO-011472. This is the deposition of Bobby J.  
4 Talley. Could you swear in the witness, please?  
5 Whereupon,

6 BOBBY J. TALLEY,  
7 having been first duly sworn, was called as a witness  
8 and was examined and testified as follows:

9

10 EXAMINATION

11 BY MR. TROTTER:

12 Q. Good afternoon, Mr. Talley.

13 A. Thank you.

14 Q. You're testifying on behalf of Olympic Pipe  
15 Line in this case?

16 A. That's correct.

17 Q. And you prepared testimony and exhibits --

18 A. Yes, I did.

19 Q. -- in that effort?

20 A. Yes, I did.

21 Q. And is BJT-1T your proposed direct  
22 testimony?

23 A. That's correct.

24 Q. Are there any substantial changes or  
25 corrections to make in that testimony?

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1 A. Again, it -- I wasn't here at the time, so  
2 I haven't seen any statistical data that supports  
3 both Bayview and Cross-Cascades, but I am aware that  
4 shippers were aware of the fact that Cross-Cascades  
5 and Bayview together would add additional capacity to  
6 the system and also understand that shippers still  
7 have an interest at this point about whether  
8 Cross-Cascades will be completed or not.

9 Q. And certain steps were taken toward the  
10 start of construction of that project, and I believe  
11 approximately \$21 million was incurred. Is that  
12 consistent with your knowledge?

13 A. Somewhere in that vicinity of the dollars.  
14 What I do know is that easements and property were  
15 obtained and Olympic was going through a permitting  
16 process at the time of the Bellingham incident, and  
17 at that point they withdrew from the Cross-Cascades  
18 project.

19 Q. Okay. So there might have been some  
20 rights-of-way acquired or land acquired. Was any  
21 facility begun construction?

22 A. No construction that I'm aware of.

23 Q. Okay. And what is the current status of  
24 the Cross-Cascades project?

25 A. There is no activities. I don't know that

1 the board of directors have indicated any future  
2 plans for Cross-Cascades. Current activities are  
3 just maintenance of current easements and options and  
4 payments required to maintain some of the land that's  
5 been obtained.

6 Q. Would it be correct to say, at this point  
7 in time, there's no future plan with respect to the  
8 Olympic -- or excuse me, with respect to the  
9 Cross-Cascades project?

10 A. None that I'm aware of.

11 Q. If there was a plan, would you be aware of  
12 it?

13 A. Not necessarily, but if it affected any of  
14 the operating personnel or if it had been mentioned  
15 in the board meetings, I would have been aware of  
16 that.

17 Q. Okay. I'll just ask you to accept, subject  
18 to your check, that there are no current plans with  
19 respect to the Cross-Cascades project. That's  
20 something you can check?

21 A. Yes.

22 Q. Okay, thank you. Is it your understanding  
23 that Olympic is not requesting any rate relief  
24 associated with Cross-Cascades in this case through  
25 CWIP or otherwise?

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