

Exhibit No. 1914 (MLT-14)
Docket No. TO-011472
Witness: Maurice L. Twitchell

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities and) DOCKET NO. TO-011472
Transportation Commission,)
)
Complainant,)
)
v.)
)
Olympic Pipe Line Company, Inc.,)
)
Respondent)
)
_____)

EXHIBIT OF

MAURICE L. TWITCHELL

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

EXCERPT FROM THE DEPOSITION OF MR. COLLINS
Tr. 1-5, 82,-83

May 24, 2002

WUTC DOCKET NO. TO-011472
EXHIBIT NO. 1914
ADMIT W/D REJECT

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BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)
TRANSPORTATION COMMISSION,)
Complainant,) Docket No. TO-011472
vs.)
OLYMPIC PIPELINE COMPANY,)
INC.,)
Respondent.)

DEPOSITION UPON ORAL EXAMINATION
OF
BRETT COLLINS

1:30 p.m.
April 25, 2002
411 - 108th Avenue Northeast, Suite 1800
Bellevue, Washington

Joan E. Kinn, CCR, RPR
Court Reporter

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6 Also Present: MAURICE TWITCHELL
7 ROBERT COLBO
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EXHIBIT	DESCRIPTION	PAGE
1	Net Trended Original Cost Rate Base According to Olympic's Direct Case	51
2	List of FERC Adjustments Made by Olympic in its Direct Case	64

1 Whereupon,

2 BRETT COLLINS,

3 having been first duly sworn, was called as a witness
4 herein and was examined and testified as follows:

5

6 E X A M I N A T I O N

7 BY MR. TROTTER:

8 Q. Good afternoon, Mr. Collins.

9 A. Good afternoon.

10 Q. You are testifying on behalf of Olympic
11 Pipeline in this case?

12 A. Yes.

13 Q. And this is a deposition in WUTC Docket
14 Number TO-011472. Have you ever been deposed before?

15 A. I have not.

16 Q. Have you ever testified before an agency or
17 court before?

18 A. No, I have not.

19 Q. Well, I'm going to ask you questions, and I'm
20 going to ask you to listen carefully to each question
21 and answer to the best of your ability, the complete
22 answer. If you have any questions or if you don't
23 understand the question, please ask me, and I will
24 clarify it. If you need to take a break for a bathroom
25 break or whatever, we will gladly arrange that.

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1 preparation of what the appropriate methodology is that
2 should be applied to what particular pipeline?

3 A. In terms of a -- in terms of what was -- you
4 mean what a witness would have put forward in a case?

5 Q. Yeah, I'm just wondering as I'm reading your
6 testimony and reading your background and experience, am
7 I supposed to read into it that you are a person that
8 understands the application of 154(b), and/or am I also
9 supposed to read into it that you're a person that
10 understands situations under which a particular
11 methodology should be applied for rate purposes?

12 A. I mean I think I understand how different
13 methodologies may apply in different situations. I have
14 not been asked to undertake such an analysis as of this
15 point, and what I prepared here was an application of
16 the FERC methodology that was used to support the
17 Olympic FERC rate filing.

18 Q. Did I understand from your answer that you
19 have not undertaken an analysis of whether or not the
20 154(b) methodology versus a DOC methodology is or is not
21 appropriate as applied to Olympic?

22 A. I have not -- I have not done an analysis of
23 that.

24 Q. So you were given -- you were asked to
25 prepare a 154(b) methodology on the assumption that it

1 would be the correct methodology to apply to Olympic?

2 A. I mean I was asked to prepare a 154(b) cost
3 of service presentation for Olympic.

4 Q. And you were not asked to look into or
5 examine whether or not that would be the appropriate
6 methodology for the Washington Commission to adopt?

7 A. As of this point, I have not been asked that,
8 given that assignment.

9 MR. BRENA: I have no further questions.

10 (Discussion off the record.)

11 MR. STOKES: I just have one question.

12

13 EXAMINATION

14 BY MR. STOKES:

15 Q. Good afternoon, Mr. Collins, was it your
16 intent for Olympic's cost of service model to be
17 compliant with opinion 154(b)?

18 A. Yes, the 154(b) calculations contained in my
19 testimony, my intent, as I have described in my
20 testimony, is that should be consistent with the 154(b)
21 opinion, and there have been some subsequent opinions
22 that have clarified certain aspects of that.

23 Q. Okay. So it's your intent that Olympic's
24 cost of service model is consistent with both 154(b) and
25 current commission methodology, current commission

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