

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of Application of

PUGET SOUND ENERGY, INC.

for (1) Approval of the Proposed Sale of
PSE's Share of the Centralia Facilities, and
(2) Authorization to Amortize Gain Over a
Five-Year Period.

DOCKET NO. UE-991409

In the Matter of Application of

AVISTA CORPORATION

for Authority to Sell Its Interest In the
Coal-Fired Centralia Power Plant.

DOCKET NO. UE-991255

In the Matter of Application of

PACIFICORP

for an Order Approving the Sale of its
Interest in (1) The Centralia Steam Electric
Generating Plant, (2) The Ratebased
Portion of the Centralia Coal Mine, and (3)
Related Facilities; For a Determination of
the Amount of and the Proper Ratemaking
Treatment of the Gain Associated with the
Sale; and for an EWG Determination.

DOCKET NO. UE-991262

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RECORDS MANAGEMENT
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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

EXHIBIT OF GORDON HOWINS

WUTC DOCKET NO. UE-991255
EXHIBIT NO. 801
ADMIT W/D REJECT

Exhibit No. 801 (GPH-2)

SUMMARY OF ELECTRIC UTILITY ENTIRE OPERATIONS IN 1990

Group I - Over 500 Employees

All Injury Frequency Rank	Name of Utility	Average No. of Employees	Fatalities/Perm. Disabilities	Lost Time Injuries	Days Lost/Charged	Medical Aid Injuries	Total No. of Injuries	Employee Hours	Hours	Disabling Injury Freq. Rate	Disabling Injury Rank	Severity Rate	Severity Rank	Avg. Days Lost Per Disabling Injury
1	Transalta Utilities	2,602	0	40	814	75	115	5,058,132	A	7.91	3	160.93	2	20
*2	Alberta Power	1,768	0	28	589	45	73	3,118,752	C	8.98	5	188.86	4	21
3	Nfld & Lab. Hydro	1,242	0	5	300	28	53	2,190,888	C	11.41	7	136.70	1	12
4	BC Hydro	5,003	0	69	2,514	238	307	9,552,085	A	7.22	2	263.19	6	36
5	Nfld Light & Power	1,110	0	12	397	54	66	1,961,370	C	6.12	1	202.41	5	33
6	Sask. Power	2,473	0	55	850	122	177	2,175,680	A	10.63	6	164.23	3	15
7	Edmonton Power	1,068	0	34	785	36	70	2,044,948	A	16.62	10	383.87	8	23
8	Nova Scotia Power	2,722	1	64	7,750	113	177	4,955,511	A	12.91	9	1,563.92	14	121
9	Manitoba Hydro	4,217	1	69	7,002	242	311	8,562,957	A	8.06	4	817.71	12	101
10	New Brunswick Power	3,217	0	141	2,022	133	274	7,108,830	A	19.83	11	284.43	7	14
11	Ontario Hydro	36,327	4	752	41,503	2,187	2,939	64,999,057	A	11.57	8	638.52	10	55
12	Hydro Quebec	24,909	1	1,293	36,730	560	1,853	39,360,082	A	32.85	12	933.18	13	28
13	City of Calgary	938	0	65	1,071	35	100	1,876,349	A	34.64	13	570.79	9	16
14	Winnipeg Hydro	638	0	63	1,000	26	89	1,225,497	A	51.41	14	816.00	11	16
TOTAL GROUP I (Entire)		88,234	7	2,710	103,327	3,894	6,604	157,190,338	-	17.24	-	657.33	-	38.13

TOTAL GROUP II		4,556	1	201	8,948	231	432	8,567,408	-	23.46	-	1,044.45	-	45.00
GRAND TOTAL		92,790	8	2,911	112,275	4,125	7,036	165,757,746	-	17.56	-	677.34	-	37.57

* - Are entitled to receive Frequency Reduction Award

A - Actual

C - Calculated

SUMMARY OF ELECTRIC UTILITY ENTIRE OPERATIONS IN 1991

Group I - Over 500 Employees

All Injury Freq. Rank	Name of Utility	Avg. No. of Emp.		Fatalities		Days Lost/Charged		Med. Aid Inj.		Total No. of Inj.	Disab. Injury Freq. Rate		Disab. Injury Rank		Avg. Days Lost Per All Injury Rate			
		Bmp.	Total	Perm.	Total	Inj.	Charged	Inj.	Aid		Hra.	Hra.	Injury	Rate	Rank	Injury	Rate	
1	TransAlta Utilities	2,694	0	0	38	542	57	57	57	95	5,165,306	A	7.36	2	104.93	3	14.3	18.39
* 2	Edmonton Power	1,099	0	0	21	389	31	31	31	52	2,104,310	A	9.98	4	184.86	5	18.5	24.71
3	Nfld & Lab Hydro	1,622	0	0	26	2,524	35	35	35	61	2,466,663	A	10.54	8	1023.24	15	97.1	24.73
4	Alberta Power	1,600	0	0	31	523	54	54	54	85	3,017,522	C	10.27	6	173.16	4	16.9	28.17
5	New Brunswick Power	3,380	0	0	130	1,930	109	109	109	239	7,535,658	A	17.25	11	256.12	8	14.8	31.72
6	Manitoba Hydro	5,004	0	0	66	655	217	217	217	283	8,663,302	A	7.62	3	75.61	1	9.9	32.67
7	BC Hydro	5,683	0	0	63	2,326	255	255	255	318	9,662,272	A	6.52	1	240.73	7	36.9	32.91
8	Nova Scotia Power	2,765	0	0	71	1,826	120	120	120	191	5,231,980	A	13.57	9	349.01	11	25.7	36.51
9	Ontario Hydro	35,646	1	1	640	19,590	1,725	1,725	1,725	2,365	61,314,379	A	10.44	7	319.50	9	30.6	38.57
10	Hydro Quebec	26,417	1	1	1,130	33,799	649	649	649	1,779	43,596,562	A	25.92	13	775.27	14	29.9	40.81
11	Sask Power	2,492	0	0	53	478	164	164	164	217	5,213,130	A	10.17	5	91.69	2	9.0	41.63
12	Newfoundland Power	980	0	0	29	480	62	62	62	91	2,038,400	A	14.23	10	235.48	6	16.6	44.64
13	City of Calgary	973	0	0	50	842	37	37	37	87	1,923,599	A	25.99	14	437.72	12	16.8	45.23
*14	Scarborough Pub. Util. Com.	518	0	0	23	311	26	26	26	49	958,558	A	23.99	12	323.92	10	13.5	51.12
15	Toronto Hydro	1,503	1	1	157	9,356	11	11	11	168	3,135,227	A	50.08	16	2984.14	16	59.6	53.58
16	Winnipeg Hydro	620	0	0	57	785	26	26	26	83	1,195,009	A	47.70	15	656.90	13	13.8	69.46
TOTAL GROUP I		92,996	3	3	2,585	76,355	3,578	3,578	3,578	6,163	163,221,877	--	15.84	--	467.80	--	29.54	37.76
TOTAL GROUP II		4,150	0	0	143	3,708	239	239	239	375	7,688,291	--	18.60	--	482.29	--	25.93	48.78
GRAND TOTAL		97,146	3	3	2,728	80,063	3,817	3,817	3,817	6,538	170,910,168	--	15.96	--	468.45	--	29.35	38.25

* Are entitled to receive Frequency Reduction Award

A - Actual

C - Calculated

SUMMARY OF ELECTRIC UTILITY ENTIRE OPERATIONS IN 1992

All Injury Freq Rank	Name of Utility	Avg. No. of Emp.	Fatalities/		Lost Time Inj.	Days Lost/ Charged	Med. Aid Inj.	Total No. of Inj.	Employee Hrs.	Disab. Injury Freq. Rate	Disab. Injury Rank	Sev. Rate	Sev. Rank	Avg. Days Lost Per		All Injury Rate	
			Total	Disab.										Disabling Injury	Injury		
1	* TransAlta Utilities	2,788	0	34	545	30	64	5,051,569	A	6.73	2	107.89	2	16.03	12.67	21.66	
2	* Edmonton Power	1,155	0	20	308	28	48	2,215,556	A	9.03	6	139.02	5	15.4	22.43	26.6	
3	Nfld. & Labrador Hydro	1,666	0	24	279	32	56	2,496,951	A	9.61	7	111.74	3	11.63	28.36	29.88	
4	* New Brunswick Power	3,487	2	101	13,014	105	206	7,744,753	A	13.04	11	1680.36	14	128.85	30.6	33.06	
5	B.C. Hydro	5,951	0	58	1,148	232	290	10,227,090	A	5.67	1	112.25	4	19.79	33.44	36.01	
6	Nfld. Light & Power	1,094	0	24	992	39	63	2,108,128	A	11.38	10	470.56	9	41.33	37.45	41.49	
7	Alberta Power	1,526	1	30	65,965	65	95	3,107,662	G	9.6	8	2122.60	16	39	43.81	47.16	
8	Ontario Hydro	34,578	2	537	22,976	1,448	1,985	60,045,296	A	8.94	5	382.64	8	42.79	76.16	108.74	
9	Manitoba Hydro	4,395	0	65	644	247	312	9,329,317	A	6.97	3	69.03	1	9.91	38.77	624.06	
10	Nova Scotia Power	2,613	0	48	988	121	169	4,693,474	A	10.23	9	210.51	6	20.58	473.59	1480.8	
11	Hydro Quebec	27,167	3	854	36,364	803	1,657	44,420,535	A	19.3	12	821.96	12	42.58	1097.65	2101.05	
12	Sask Power	2,572	1	47	6,538	155	202	5,331,099	A	8.82	4	1226.39	13	139.11			
13	City of Calgary	935	0	46	470	32	78	1,879,971	A	24.47	13	250.03	7	10.22			
14	Scarborough Pub. Util.	529	0	29	538	14	43	981,539	A	29.55	14	548.12	10	18.55			
15	Winnipeg Hydro	614	0	61	866	29	90	1,181,650	A	51.62	15	732.87	11	14.2			
16	Toronto Hydro	1,636	1	233	12,504	73	306	2,814,157	A	82.8	16	4478.78	16	54.09			
TOTAL GROUP I		92,706	10	2,211	164,239	3,453	5,664	163,628,747	-	307.8	--	200.74	--	624.06	38.77		
TOTAL GROUP II		3,971	0	142	2,773	216	358	7,346,773	-	720.6	--	13465	--	473.59			
GRAND TOTAL		96,677	10	2,353	167,012	3,669	6,022	170,975,520	-	1028	--	25569	--	1097.65			

* Are entitled to receive Frequency Awards

A - Actual

C - Calculated

Alberta Power information was lost in transit and was not received by the print deadline.



**SUMMARY OF ELECTRIC UTILITY ENTIRE OPERATIONS IN 1993
GROUP I - OVER 500 EMPLOYEES**

All Injury Freq. Rank	Name of Utility	Avg. No. of Emp.	Fatalities Per Total Disab.	Lost Time Injury	Days Lost/Charged	Med. Aid Injuries	Total No. of Injuries	Actual Employee Hours	Disab. Freq. Rate	Disab. Freq. Rate	Sav. Rate	Sav. Rank	Avg. Days Lost Per Disab. Injury	All Injury Rate
1	** TransAlta Utilities	2,737	0	31	576	30	61	4,791,787	6.5	3	120.2	4	18.6	12.7
2	** New Brunswick Power	3,286	0	49	639	73	122	6,508,822	7.5	4	98.2	3	13.0	18.7
3	Nfld. & Labrador Hydro	1,609	0	34	510	18	52	2,501,187	13.6	10	203.9	8	15.0	20.8
4	Edmonton Power	1,354	0	22	133	35	57	2,527,283	8.7	5	52.6	1	6.1	22.6
5	** Manitoba Hydro	4,135	0	33	529	177	210	8,641,239	3.8	1	61.2	2	16.0	22.6
6	B.C. Hydro	6,371	1	65	1,992	282	347	10,642,569	6.1	2	187.2	6	30.7	32.6
7	Nova Scotia Power Inc.	2,350	0	48	1,509	103	151	4,451,360	10.8	6	339.0	11	31.4	33.9
8	Hydro Quebec	26,981	3	732	31,379	791	1,523	43,659,621	16.8	12	718.7	13	42.9	34.9
9	Alberta Power Ltd.	1,423	0	35	674	69	104	2,904,506	12.1	7	232.1	9	19.3	35.8
10	Ontario Hydro	24,969	0	529	13,318	1,076	1,605	43,828,713	12.1	8	303.9	10	25.2	36.6
11	Sask. Power	2,547	0	69	1,039	131	200	5,417,304	12.7	9	191.8	7	15.1	36.9
12	Nfld. W.L. & Power	859	0	29	319	38	67	1,744,283	16.6	11	182.9	5	11.0	38.4
13	City of Calgary	875	0	58	1,213	46	104	1,717,428	33.8	13	706.3	12	20.9	60.6
14	Winnipeg Hydro	608	0	56	1,066	24	80	1,158,515	48.3	14	920.1	14	19.0	69.1
15	Toronto Hydro	1,662	0	216	6,800	65	281	2,633,638	82.0	15	2,582.0	15	31.5	106.7
TOTAL GROUP I		81,766	4	2,006	61,695	2,958	4,964	143,128,165	19.2		460.0		21.1	39.0
TOTAL GROUP II		4,854	0	187	3,009	225	412	9,189,449	32.0		635.3		17.5	56.3
GRAND TOTAL		86,620	4	2,193	64,705	3,183	5,376	152,317,604	25.6		547.7		19.3	47.7

** Frequency Reduction Award Winner

Summary of Electric Utility Entire Operations in 1994

Group I - over 500 employees

Canadian Electrical Association

All Injury/Illness Freq. Rank	Name of Utility	Average No. of Employees	Fatal Injuries	Disabling Injury/Illness	Days Lost/Charged	Medical Aid Injury/Illness	Total No. of Injuries/Illnesses	Actual Employee Hours	Disabling Frequency Rate	Disabling Frequency Rank	Severity Rate	Severity Rank	Avg. Days Lost Per Disabling Injury/Illness	All Injury/Illness Freq. Rate
1	TransAlta Utilities	2,242	0	16	104	33	49	4,353,526	0.7	1	23.9	1	6.5	2.3
2	Nfld. & Labrador Hydro	1,559	1	17	6,141	27	44	2,328,641	1.5	4	2637.2	14	361.2	3.8
3	New Brunswick Power	2,774	0	64	2,780	58	122	5,637,231	2.3	9	493.1	8	43.4	4.3
4	B.C. Hydro	6,336	0	67	2,859	234	301	10,413,780	1.3	2	274.5	6	42.7	3
5	Edmonton Power	1,202	0	23	437	49	72	2,445,775	1.9	6	178.7	4	19.0	5.9
6	Hydro-Québec	25,400	2	523	25,590	695	1,218	41,188,973	2.5	11	621.3	9	48.9	5.9
7	Ontario Hydro	22,492	1	427	12,681	839	1,266	41,528,949	2.1	8	305.4	7	29.7	6.1
8	Manitoba Hydro	4,018	1	57	13,521	202	259	8,273,365	1.4	3	1634.3	13	237.2	6.3
9	SaskPower	2,580	0	47	473	136	183	5,434,497	1.7	5	87.0	2	10.1	6.7
10	Newfoundland Power	807	0	29	1,182	34	63	1,845,115	3.1	12	640.6	10	40.8	6.8
11	Alberta Power Ltd.	1,375	0	28	408	72	100	2,810,813	2.0	7	145.2	3	14.6	7.1
12	Nova Scotia Power	2,291	0	49	892	106	155	4,149,606	2.4	10	215.0	5	18.2	7.5
13	City of Calgary	840	0	47	1,158	35	82	1,605,027	5.9	13	720.2	11	24.6	10.2
14	Winnipeg Hydro	593	0	42	1,478	26	68	1,174,483	7.2	14	1258.4	12	35.2	11.6
	TOTAL GROUP I	74,509	5	1,436	69,702	2,546	3,982	133,189,781	2.2		523.3		48.5	7.0
	TOTAL GROUP II	4,335	1	183	9,335	289	402	8,873,016	3.7		1051.8		57.3	7.1
	GRAND TOTAL	79,145	6	1,599	78,037	2,785	4,384	142,062,797	2.3		556.3		49.4	6.2

Summary of Electric Utility Entire Operations In 1995

Group I - over 500 employees

All Injury/Illness Freq. Rank	Name of Utility	Average No. of Employees	Fatal Injuries	Disabling Injury/Illness	Days Lost/Charged	Medical Aid Injury/Illness	Total No. of Injuries/Illnesses	Actual Employee Hours	Disabling Frequency Rate	Disabling Frequency Rank	Severity Rate	Severity Rank	Avg. Days Lost Per Disabling Injury/Illness	All Injury/Illness Freq. Rate
1	C.V.G. Electric Dal Caroni	3,953*	0	35	1,039	27	62	7,905,775	0.9	3	131.4	7	29.7	1.6
2	** Edmonton Power	1,165	0	1	5	19	20	2,258,417	0.1	1	2.2	1	5.0	1.8
3	TransAlta Utilities	2,366	0	15	341	41	56	4,066,208	0.7	2	83.9	3	22.7	2.1
4	Nfld. & Labrador Hydro	1,141	0	17	101	28	45	1,826,153	1.9	9	55.3	2	5.9	4.9
5	Alberta Power Ltd.	1,366	0	19	278	52	71	2,782,597	1.4	6	99.9	6	14.6	5.1
6	New Brunswick Power	2,985	0	59	844	85	144	5,482,550	2.2	10	153.9	8	14.3	5.3
7	B.C. Hydro	5,982	0	71	2,587	220	291	11,062,560	1.3	5	233.9	9	36.4	5.3
8	Hydro-Quebec	25,613	0	489	11,546	679	1,168	40,669,213	2.4	12	283.9	10	23.6	5.7
9	Ontario Hydro	21,369	0	308	3,480	843	1,151	40,004,781	1.5	7	87.0	4	11.3	5.8
10	Manitoba Hydro	4,083	0	45	772	201	246	8,274,562	1.1	4	93.3	5	17.2	5.9
11	Nova Scotia Power	2,028	0	36	4,777	88	124	3,889,293	1.9	8	1228.2	13	132.7	6.4
12	Sask Power	2,554	1	52	7,381	145	198	4,769,745	2.2	11	1547.5	14	141.9	8.3
13	Nfld. Light & Power	742	0	32	1,297	33	65	1,490,958	4.3	13	869.9	11	40.5	8.7
14	City of Calgary	809	0	46	1,418	35	81	1,507,059	6.1	14	940.9	12	30.8	10.7
15	Winnipeg Hydro	594	1	51	7,261	32	84	1,122,499	9.1	15	6468.6	15	142.4	15.0
TOTAL GROUP I		76,750	2	1,276	43,127	2,528	3,806	137,112,370	1.9		314.5		33.8	5.6
TOTAL GROUP II		4,208	0	136	1,387	184	320	7,918,673	3.4		175.2		10.2	8.1
GRAND TOTAL		80,958	2	1,412	44,514	2,712	4,126	145,031,043	1.9		306.9		31.5	5.7

** Frequency Reduction Award Winner

* Information estimated, based on the formula 2,000 hours per employee (average work year), divided by actual employee hours

1. Accident/Illness Experience

1.1 All Injury/Illness Frequency Rate

1996 Annual Data

Group I - Over 10,000 Employees

1	Ontario Hydro	5.8
2	Hydro-Québec	5.9

COMPOSITE GROUP I 5.8

Group II - Over 500 Employees, Under 10,000

1	Edmonton Power	1.5
2	TransAlta Utilities Corp.	2.8
3	New Brunswick Power	4.8
4	Nova Scotia Power Inc.	4.9
5	Nfld. & Labrador Hydro	5.2
6	Manitoba Hydro	5.4
7	B.C. Hydro	5.6
8	Newfoundland Power	5.9
9	Alberta Power Ltd.	7.1
10	SaskPower	9.9
11	City of Calgary Electric System	10.5
12	Winnipeg Hydro	13.0

COMPOSITE GROUP II 5.8

1996 COMPOSITE CEA 5.9

Group III - Under 500 Employees

1	Industries James Maclaren Inc.	0.0
2	Deer Lake Power Co. Ltd.	0.0
3	York Hydro	1.2
4	Hydro Mississauga	4.2
5	Cornwall Electric	4.3
6	Markham Hydro	4.6
7	Saint John Power Com.	4.8
8	Cambridge & N Dumfries HEC	5.0
9	North York Hydro	5.1
10	Ottawa Hydro	5.9
11	Maritime Electric	7.0
12	Yukon Electrical Co. Ltd.	7.3
13	Great Lakes Power Ltd.	7.6
14	Churchill Falls (Labrador) Corp.	8.3
15	Scarborough PUC	8.8
16	Penticton, City of	8.8
17	Gloucester Hydro	9.3
18	West Kootenay Power	9.5
19	Medicine Hat Electric Utility	11.0
20	Caribbean Utilities Co. Ltd	12.1
21	Red Deer, City of	12.1
22	Hydro Sherbrooke	14.4
23	Nepean Hydro	15.4
24	Swift Current Light & Power	25.3

COMPOSITE GROUP III 7.5



1. Accident/Illness Experience

1.1 All Injury/Illness Frequency Rate

1997 Annual Data

Group I - Over 10,000 Employees

1	Ontario Hydro	4.72
2	Hydro-Québec	6.52

COMPOSITE GROUP I 5.53

Group II - Over 500 Employees, Under 10,000

1	Edmonton Power	2.17
2	Nova Scotia Power Inc.	2.20
3	TransAlta Utilites Corp.	2.60
4	Manitoba Hydro	3.43
5	Newfoundland & Labrador Hydro	4.60
6	BC Hydro	5.34
7	Newfoundland Power	6.44
8	ENMAX Corporation	7.19
9	Alberta Power Ltd.	7.61
10	SaskPower	8.15
11	Toronto Hydro (1997)	11.22
12	Winnipeg Hydro	17.53

COMPOSITE GROUP II 5.39

Group III - Under 500 Employees

1	Deer Lake Power Co. Ltd.	0.00
2	Maine & New Brunswick Electrical	0.00
3	La Compagnie Hydroelectrique Manicouagan	0.00
4	Markham Hydro	0.00
5	Hydro Mississauga	0.73
6	Churchill Falls (Lab.)	1.92
7	North York Hydro	2.22
8	Saint John Power Commission	2.26
9	St. Thomas PUC	2.76
10	Cornwall Electric	2.91
11	Ottawa Hydro	2.93
12	Red Deer, City of	2.97
13	Great Lakes Power	2.99
14	Canadian Niagara Power Co. Ltd	5.19
15	York Hydro	5.99
16	Saskatoon, City of	6.04
17	Maritime Electric	6.21
18	Scarborough PUC	6.62
19	Cambridge&N. Dumfries HEC	8.74
20	Hydro Sherbrooke	8.85
21	West Kootenay Power	11.25
22	Yukon Electrical Co. Ltd.	14.61
23	Industries James Maclaren Inc.	15.92
24	Lethbridge, City of	16.03
25	Gloucester Hydro	17.65
26	Orillia Water Light & Power	20.98
27	Penticton, City of	26.41
28	Swift Current Light&Power	35.47
29	Medicine Hat Electric Utility	35.72

COMPOSITE GROUP III 6.13

COMPOSITE CEA

5.51



1. Accident/Illness Experience

1.1 All Injury/Illness Frequency Rate - Annual Data

Group I - Over 10,000 Employees

1 Hydro-Québec	3.71
2 Ontario Hydro	4.40

COMPOSITE GROUP I 4.09

Group II - Over 500 Employees Under 10,000

1 TransAlta Utilites Corp.	1.94
2 Nova Scotia Power Inc.	2.21
3 Edmonton Power	3.02
4 Manitoba Hydro	3.17
5 Nfld&Labrador Hydro	3.67
6 New Brunswick Power	3.89
7 Alberta Power Ltd	5.60
8 Enmax Corporation	5.65
9 Newfoundland Power	5.67
10 BC Hydro	6.11
11 SaskPower	6.78
12 Toronto Hydro (1998)	8.81
13 Winnipeg Hydro	12.61

COMPOSITE GROUP II: 4.90

COMPOSITE CEA: 4.47

Group III - Under 500 Employees

1 Deer Lake Power Co. Ltd	0.00
2 Maine & New Brunswick Electr.	0.00
3 Swift Current Light&Power	0.00
4 Yukon Electrical Co. Ltd.	0.00
5 Ottawa Hydro	0.74
6 Cornwall Electric	2.93
7 Hydro Mississauga	3.38
8 Saskatoon, City of	4.14
9 Saint John Power Commission	4.46
10 Industries James Maclaren Inc.	4.88
11 Great Lakes Power	5.85
12 Churchill Falls (Lab.)	6.11
13 Cambridge&N. Dumfries HEC	6.27
14 Hydro Sherbrooke	6.75
15 Bermuda Electric Comp	7.08
16 Maritime Electric	7.43
17 Orillia Water Light & Power	7.56
18 Penticton, City of	9.73
19 West Kootenay Power	9.79
20 Canadian Niagra Power Co. Ltd	10.04
21 Lethbridge, City of	13.11
22 Red Deer, City of	14.24
23 La Comp. Hydro. Manicouagan	24.89

COMPOSITE GROUP III 5.74

Revised April 1999



**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of Application of

PUGET SOUND ENERGY, INC.

for (1) Approval of the Proposed Sale of
PSE's Share of the Centralia Facilities, and
(2) Authorization to Amortize Gain Over a
Five-Year Period.

DOCKET NO. UE-991409

In the Matter of Application of

AVISTA CORPORATION

for Authority to Sell Its Interest In the
Coal-Fired Centralia Power Plant.

DOCKET NO. UE-991255

In the Matter of Application of

PACIFICORP

for an Order Approving the Sale of its
Interest in (1) The Centralia Steam Electric
Generating Plant, (2) The Ratebased
Portion of the Centralia Coal Mine, and (3)
Related Facilities; For a Determination of
the Amount of and the Proper Ratemaking
Treatment of the Gain Associated with the
Sale; and for an EWG Determination.

DOCKET NO. UE-991262

**DIRECT TESTIMONY OF GORDON
HOWINS**

WUTC DOCKET NO. UE-991255

EXHIBIT NO. 802

ADMIT W/D REJECT

1 Q: Please provide your name and business address.

2 A: My name is Gordon Howins. My business address is 1555 South Fawcett
3 Avenue, Tacoma, WA 98402.

4 **Background**

5 Q: For whom do you work and in what capacity?

6 A: I am the elected Business Manager for Local No. 612 of the International Union
7 of Operating Engineers. I have held this position since February 1992.

8 Q: Please describe your work history prior to serving as Business Manager.

9 A: I worked as a Business Representative for Local 612 for thirteen years before
10 becoming the Business Manager. Prior to that I worked for 10 years in the heavy
11 construction industry.

12 Q: Whom does Local 612 represent?

13 A: Among other bargaining units, Local 612 is the certified collective bargaining
14 representative for approximately 400 employees at the Centralia coal mine. Currently,
15 the Union has a contract with the Centralia Mining Company, which is a subsidiary of
16 PacificCorp.

17 Q: Have you filed testimony with the commissions before?

18 A: No.

19 **Summary of Testimony**

20 Q: What is the purpose of your testimony?

21 A: My testimony will discuss TransAlta's record on safety and operational stability
22 as they pertain to the larger public interest.

1 **Safety**

2 Q. How important is the buyer's record on safety?

3 A. For Local 612 it is extremely important, perhaps the top priority for our members
4 in assessing the qualifications of any company looking to purchase the Centralia facility.

5 A company's safety record says a lot about its philosophy, character, and priorities. It
6 provides a fairly reliable way for us to anticipate what type of operator a company will
7 be. Safety is important on several levels: First and foremost for the men and women
8 working at the mine and plant. Second, it is my experience that companies that run safe
9 plants also operate a well-maintained and efficient plant. This translates into fewer
10 operational interruptions, more efficiency, and greater output. Third, from a community
11 perspective, a safe facility will be a crisis free facility. By that I mean free from
12 emergency or catastrophic situations.

13 Q. Are you familiar with exhibit No. 801?

14 A. Yes. It is data on TransAlta's safety record for about the past ten years. It was
15 prepared by the Canadian Electrical Association (CEA).

16 Q. What is your view of TransAlta's record on safety and workplace injury?

17 A. The data demonstrate that TransAlta takes safety and workplace injuries
18 seriously. As a result, they are one of the safest electrical utility companies in Canada.
19 In fact according to their annual report (PPL Application Exhibit No. 5, TransAlta
20 Annual Report to Shareholders, page 26), for the past three years TransAlta has received
21 the CEA's Award of Excellence for having one of the best safety records in Canada.
22 TransAlta's literature reflects a commitment to taking proactive, preventative steps in the

1 area of safety. This seems to reflect an understanding that employee morale, safety, and
2 productivity are bound up together.

3 Q. Are you familiar with exhibit No. 803?

4 A. Yes, it is an excerpt from TransAlta's 1998 Sustainable Development Report from
5 their website. It elaborates on how the injury incident frequency rate and the injury
6 incident rates are calculated in the CEA data. The incident severity rate indicates the
7 number of injury incidents or occupational illnesses for every 200,000 hours worked.
8 The severity rate reflects the number of calendar days lost due to injury incidents for
9 every 200,000 hours worked.

10 Q. Describe other TransAlta safety highlights?

11 A. According to exhibit No. 803, several of TransAlta's Canadian plants have
12 achieved safety milestones. The Keephills thermal generation plant has gone eight years
13 without a lost time incident, while the Alberta hydroelectric facilities achieved a new
14 record for no lost time or medical aid injuries in 1998.

15 **Operational Stability**

16 Q. Is operational stability in the public's interest?

17 A. Yes. Operational stability is bound up with quality service and customer
18 satisfaction and is undeniably in the public interest. Along with safety, one of the
19 paramount considerations the Commission ought to evaluate is whether an incoming
20 buyer can provide uninterrupted, dependable, quality service to the state's consumers.

21 Q. What factors contribute to operational stability of a power plant and mine?

22 A. One of the key factors that foster a stable operational environment is positive
23 relations between the company and the men and women whom it employs.

1 Q. How does TransAlta measure up in this area?

2 A. TransAlta's history of stability in the area of operations is noteworthy.
3 According to exhibit No. 802, it has enjoyed strike free relationships with two of its
4 workforces' unions for fifty years. In my experience, companies that treat workers and
5 their collective bargaining agents with respect, permit significant union involvement, and
6 engage in open communication, foster a relationship based on trust. Companies with this
7 approach typically enjoy productive, stable relationships with their employees. This
8 translates into operational stability. TransAlta's record in Canada reflects this approach.

9 Q. Please describe TransAlta's approach to environmental concerns.

10 A. TransAlta appears to be a leader among Canadian industry with respect to taking
11 initiative on reduction of greenhouse gas (GHG) emissions (Annual Report at 25), having
12 already reduced its emissions of GHG to below its 1990 levels. Also, TransAlta is
13 currently working proactively to bring its Canadian facilities in compliance with
14 international environmental standards.

15 Q. Explain why this is significant.

16 A. Given the need to install and operate the scrubbers at the Centralia plant, it is
17 important that the buyer have a demonstrated commitment to environmental concerns.
18 The sale of the mine and power plant will enable the facility to continue to operate in
19 compliance with state environmental requirements. TransAlta has committed to
20 completing the installation of the scrubbers on the power plant, which will drastically
21 reduce its emissions. These scrubbers, currently under construction, will make the plant
22 one of the cleanest facilities in the nation.

1 Q. Do you support the application seeking approval for the sale of the Centralia
2 facility to TransAlta?

3 A. I do for the reasons mentioned above. Additionally, this facility provides
4 hundreds of family wage jobs, jobs that provide benefits and livable wages, to an area
5 that is economically troubled. Thurston and Lewis Counties cannot afford to lose quality
6 family wage jobs like this.

7 Q. Does this conclude your direct testimony?

8 A. Yes.

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DOCKET NO. UE-991262

EXHIBIT OF GORDON P. HOWINS

WUTC DOCKET NO. UE-991255
EXHIBIT NO. 803
ADMIT W/D REJECT

Environment, Health & Safety

Our integrated corporate EH&S Management System drives the development of programs that address specific risk and compliance issues throughout the business. It also ensures that we meet standards that keep us firmly on track to achieve operational excellence.

Sustainable Development Overview

Performance Review

→ Environment, Health & Safety

Greenhouse gas management

Sustainable growth management

1998 key accomplishments

Statistical Information

TransAlta's EH&S Management System has two key components: the Environmental Management System (EMS) and the Health & Safety Management System (H&SMS). Both systems are supported by customized programs to address particular risks and regular audits.

Our dynamic and evolving EH&S Management System is flexible, to allow us to identify new issues and programs as required, and rigorous, to ensure that all issues are addressed to the same demanding standards. In 1998 and 1999, our focus is on improving the environmental component to meet the International Organization for Standardization's (ISO) 14001 standard in some areas of the business.

As a member of the Canadian Electricity Association, TransAlta is participating in a new industry-wide program that includes implementing an environmental management system that meets the ISO 14001 standard at our Alberta generating facilities and Transmission & Distribution operations. The ISO 14001 standard requires well defined processes for how the EMS is designed, operated, maintained, reviewed and improved. Through the Canadian Electricity Association's Environmental Commitment and Responsibility program, ours is the first industry sector to announce a timetable for establishing an EMS that is consistent with the requirements of ISO 14001.

The EMS at our Alberta generating facilities will meet the ISO 14001 standard by the end of 1999. This work includes separate facility-specific programs to address air, water, waste and chemical management. One of our thermal generating plants will register its EMS through a third-party registrar, who will audit the system to confirm it meets ISO requirements. The other generation facilities' EMS will be self-declared consistent with the ISO standard by year end 1999.

Our Transmission & Distribution operations in Alberta will enhance their EMS to meet the ISO 14001 standard by 2002, on track with the schedule set out by the Environmental Commitment and Responsibility program.

TransAlta's independent power plants in Ontario have an EMS in place that is based on the ISO framework. An independent audit of the EMS at these facilities was conducted in 1997. As new cogeneration plants and other international operations

come on-stream, we will develop and implement an EMS consistent with TransAlta's corporate policy and standards.

The number of environmental incidents that occur at a facility is often a good indication of how well its environmental management system is working. Our Alberta electricity generating facilities continue to be ranked in the top tier with respect to reducing environmental incidents. In Ontario, our three cogeneration plants, which have been operating for a combined 14 years (two plants for six years and one for two years), have recorded two minor environmental incidents (click here for more information).

Health and safety performance improves In 1996, TransAlta set a goal to meet and then beat, by 2001, the safety records of other companies that report the world's best safety performance. To achieve this goal, we've introduced several initiatives throughout the company:

- employee-led Safety Challenge steering committees in Generation and Transmission & Distribution took on the task of driving performance excellence in safety;
- one of the priorities for the groups was implementing safe work plans -- a process used to identify risks and develop plans to manage risks before beginning work; and
- a new customized safety awards program also addresses specific high-risk work and workplace issues.

And we continue to make gains to achieve our safety goal:

- the Keephills thermal generation plant reached a new safety record in April 1998: eight years without a lost-time incident;
- our Ontario cogeneration plants have never had a lost-time incident;
- our Alberta hydroelectric facilities achieved a new record for no lost-time or medical-aid incidents in 1998; and
- employees in Transmission & Distribution reached one million consecutive hours without a lost-time incident in August 1998.

In 1998, we introduced several new programs to address key workplace health issues. More than 700 employees participated in workshops to learn about the importance of ergonomics and back care in preventing injuries and improving health. As well, we initiated a new disability case management policy and process to make sure active treatment plans are in place and reviewed regularly to help employees make a safe and healthy return to work. Additional benefits of the program are improved productivity and employee morale and lower costs.

Injury incident frequency rate

	1993	1994	1995	1996	1997	1998
TransAlta*	2.50	2.30	2.80	2.80	2.60	1.99
Canadian Electricity Association (CEA)**	7.80	6.00	5.60	5.90	5.39	—**

* Including TransAlta Alberta-based operations only

** CEA average — 1998 information is not yet available

The injury incident frequency rate indicates the number of injury incidents or occupational illness for every 200,000 hours worked. TransAlta has consistently had a frequency rate well below the average of Canadian electric utilities of comparable size.

Injury incident severity rate

	1993	1994	1995	1996	1997	1998
TransAlta*	24.04	23.90	83.80	10.70	13.06	300.6
Canadian Electricity Association (CEA)**	92.00	523.30	314.50	65.50	178.29	—**

* Including TransAlta Alberta-based operations only

** CEA average — 1998 information is not yet available

Severity rate indicates the number of calendar days lost due to injury incidents for every 200,000 hours worked.

Despite improvements in safety performance, TransAlta had a fatality in 1998. This tragic event has further reinforced our commitment to safety. Prior to 1998, TransAlta had not had a fatality for 10 years.

Auditing provides critical check Auditing is a key element of the EH&S Management System to help ensure TransAlta meets its objectives of compliance and continuous improvement. The EMS includes two auditing programs. Arthur D. Little developed TransAlta's Compliance Auditing Program, which ensures our adherence to government regulations and operating permits and approvals. Our Management System Integrity Auditing Program, developed by PricewaterhouseCoopers, tests our performance against management system standards. TransAlta's auditing program requires facilities to be audited on average once every three years depending on risk and facility performance.

For more information about TransAlta's environment, health and safety plans & targets, click [here](#).

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