

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Complainant,

v.

OLYMPIC PIPE LINE COMPANY, INC.,

Respondent.

DOCKET NO. TO-011472

OLYMPIC PIPE LINE COMPANY'S
REQUESTED ORDER OF WITNESSES

1. Olympic Pipe Line Company submits this Requested Order of Witnesses pursuant to the Washington Utilities and Transportation Commission's Eleventh Supplemental Order dated April 29, 2002. The name and address of Olympic is as follows:

Steven C. Marshall
William R. Maurer
Perkins Coie LLP
One Bellevue Center, Suite
1800
411 – 108th Ave. Northeast
Bellevue, WA 98004-5584
Telephone: (425) 453-7314
Facsimile: (425) 453-7350
Smarshall@perkinscoie.com
wmaurer@perkinscoie.com

Robert C. Batch, President
Olympic Pipe Line Company
2201 Lind Ave., S.W.
Suite 270
Renton, WA 98055
Telephone: (425) 235-7736
Facsimile: (425) 981-2525

Bernadette J. Zabransky
Director – Pipeline Tariff &
Regulatory Affairs
BP Pipelines (North America)
Inc.
801 Warrenton Rd.,
Suite 700
Lisle, Illinois 60532
Telephone: (630) 434-2680
Facsimile: (630) 493-3707
Zabranbj@bp.com

2. This Request brings into issue the following statutes and regulations: WAC 480-09-735.

REQUESTED ORDER OF WITNESSES

3. Olympic submits this Request and asks the Commission to schedule witnesses in the order indicated below. It is important to note, however, that Olympic is still reviewing Staff and Intervenors' testimony, has not received or reviewed responses to all of its data requests, and will conduct depositions next week. The order and subject matter indicated herein should therefore be considered preliminary and may be subject to modification.

4. Olympic requests the following witness order for the first week of the general rate hearing in Docket No. TO-011472, scheduled to begin Wednesday, June 19, 2002:¹

1. Dr. George Schink (See direct testimony; rebuttal to Staff and Intervenors on rate methodologies, principles and application of those principles to Olympic; rebuttal to topics in his direct testimony.)

2. Leon Smith (Background on oil pipeline industry rate practices and industry standards in rebuttal to Staff and Intervenors' assumptions and contentions.)

5. Witness order requested for the second week of the general rate hearing in Docket No. TO-011472, scheduled to resume Tuesday, June 25, 2002:

1. Larry Peck (Rebuttal to Staff and Intervenors on incorrect assumptions, misstatements on industry standards and on the consequences of their recommendations, including inability to obtain new funds from BP and the suspension of new capital projects.)

2. Bob Batch (See direct testimony; overall introduction of Olympic witnesses; rebuttal to Staff and Intervenors on topics of direct testimony, such as BP management contract, OPS orders, ERW seam test consequences, and safety priorities principles.)

¹ (The anticipated general topic of the witnesses testimony is listed after the witness name).

3. Bobby Talley (See direct testimony; rebuttal to Staff and Intervenors on ERW Seam failure issues, throughput and Bayview. The permanently increased costs of new federal, state and local regulations and the consequences on future capital projects and associated OPS consequences.)

4. Dan Cummings (Rebuttal to Staff and Intervenors' statements and calculations on removal of the communications with counties and public officials.)

5. Jerry Schau (Rebuttal to Staff and Intervenors' assumptions and statements regarding OPS pressure restrictions.)

6. Bill Beaver (See direct testimony as updated; rebuttal to Staff and Intervenors' incorrect assumptions on topics in direct testimony such as Whatcom Creek and OPS.)

7. Jim Mach (Rebuttal to Staff and Intervenors' statements on status of independent audit and related issues.)

8. Christy Omohundro (See direct testimony; rebuttal to Staff and Intervenors on the topics in direct testimony such as public interest factors, end result consequences, and past state regulatory documents for oil pipeline rate methods and transitions.)

9. Brett Collins (See direct testimony; response to Staff and Intervenors on topics in direct testimony.)

10. George Ganz (Rebuttal to Staff and Intervenors regarding Brett Collins, Cindy Hammer and Christy Omohundro's testimony.)

11. Bob Read (Rebuttal to Staff and Intervenors regarding Brett Collins, Cindy Hammer and Christy Omohundro's testimony.)

12. Amir Saeed (Rebuttal to Staff and Intervenors regarding topics in the testimony of Brett Collins, Cindy Hammer and Christy Omohundro's testimony.)

13. Cindy Hammer (See direct testimony; response to Staff and Intervenors on topics in direct testimony.)

14. Howard Fox (Rebuttal testimony on the need for the rate increase, the consequences of insufficient rates, mistaken assumptions and conclusions of Staff and Intervenors, and public interest factors.)

III. REQUEST

Olympic requests that the Commission issue an order scheduling a preliminary order of witnesses as described above.

DATED this 3rd day of June, 2002.

Respectfully submitted,

PERKINS COIE LLP

By _____
Steven C. Marshall, WSBA #5272
William R. Maurer, WSBA #25451

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date I caused to be served copies of Olympic Pipe Line Company's Requested Order of Witnesses and this Certificate of Service via email, facsimile and U.S. Mail, to the following:

Mr. Donald T. Trotter/Lisa Watson Washington Utilities and Transportation Commission 1400 S. Evergreen Park Drive S.W. P. O. Box 40128 Olympia, WA 98504-0128 360-586-5522 (Fax) dtrotter@wutc.wa.gov	Mr. Edward A. Finklea/Chad Stokes Energy Advocates LLP 526 N.W. 18th Avenue Portland, OR 97209-2220 503-721-9121 (Fax) efinklea@energyadvocates.com
Robin O. Brena, Esq. Brena Bell & Clarkson, P.C. 310 K Street, Suite 601 Anchorage, AK 99501 907-258-2001 (Fax) rbrena@brenalaw.com	C. Robert Wallis Administrative Law Judge 1300 S. Evergreen Park Drive S.W. Olympia, WA 98504-7250 bwallis@wutc.wa.gov

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Dated this 3rd day of June, 2002 in Bellevue, Washington.

Cindy Peterson