

1 **Direct Testimony of Earl “Skip” Walton**

2 **Introduction**

3 **Q. Please introduce yourself to the Commission.**

4 A. My name is Earl “Skip” Walton. I am the Power Asset Operations Leader at
5 Kimberly-Clark Tissue Company’s Everett pulp and paper mill in Everett,
6 Washington (the “Facility”). My primary responsibilities are for the daily operations
7 of the cogeneration system boiler and turbine generator, and I make forecasts for
8 natural gas used at the Facility. Mark Armstrong, the Utilities Team Leader, is my
9 supervisor. I have worked at the Facility since 1966 and have held positions as asset
10 leader for the recovery boiler, wastewater treatment asset leader, and shift supervisor
11 in the utilities and pulp drying operations.

12 **Q. What is the subject of your testimony?**

13 A. My direct testimony addresses the following subjects:

- 14 1. Communications with Puget Sound Energy (“Puget”) regarding the Facility’s
15 natural gas needs and the curtailment; and
- 16 2. Safety issues at the Facility relating to insufficient natural gas supply.

17 **Communications with Puget Regarding the Facility’s Natural Gas Needs**

18 **Q. Do you regularly communicate with Puget in the general course of your job
19 duties?**

20 A. Yes.

21 **Q. Please explain the nature and extent of those communications.**

22 A. I make daily forecasts of natural gas needs at the Facility. I speak to the Puget
23 dispatcher on a daily basis to inform Puget of our operational needs for natural gas for
24 that day.

25 **Q. How long have you held your current position of Power Asset Operations**

1 **Leader?**

2 A. Approximately three years.

3 **Q. During that time, has Puget ever asked you to reduce natural gas consumption at**
4 **the Facility because of pressure problems on the pipeline system?**

5 A. No.

6 **Q. Did you have daily communications with Puget dispatch during the gas**
7 **curtailment, December 19 to December 28, 1998?**

8 A. Yes.

9 **Q. What was your first communication with Puget during the curtailment?**

10 A. At approximately 7:30 p.m. on December 19, 1998, Puget called me at home to notify
11 us that a natural gas curtailment would take effect that day at 10:00 p.m.

12 **Q. Other than your daily talk with Puget dispatch, what was your next**
13 **communication with Puget during the curtailment?**

14 A. At approximately 2:00 p.m. on December 24, 1998, I called Puget dispatch and
15 notified them that we needed to fire the cogeneration boiler (No. 14) with natural gas
16 beginning at approximately 9:00 p.m. that night. This would require us to use non-
17 firm gas, and the dispatcher told me that we would be burning penalty gas. However, the
18 Puget dispatcher did not have any objection to our using penalty gas, and he said that
19 if the Facility's gas use was impacting the pressure in the distribution system, then
20 Puget would call us.

21 **Q. Did Puget ever call you or otherwise notify you that the Facility's use of non-**
22 **firm or penalty gas was impacting the pressure in the distribution system?**

23 A. No.

24 **Q. Why did Kimberly-Clark need to begin using non-firm gas on the evening of**
25 **December 24, 1998?**

1 A. That morning, the Kimberly-Clark employee who was serving as the utilities “on-
2 call” person informed me that PN Industrial Fuel Corporation (“PN”) had notified us
3 that the last diesel fuel delivery would be at 6:30 p.m. that evening, Christmas Eve.
4 Mr. Kevin Buffum of PN had earlier assured me that PN could meet the Facility’s
5 diesel fuel needs through December 28, 1998. So, I contacted Mr. Buffum about the
6 last delivery notice we received, and Mr. Buffum said that all of his truck drivers were
7 reaching their maximum total hours, which is regulated by the Department of
8 Transportation. The drivers were making more deliveries because of the cold weather
9 and they were running out of hours. Mr. Buffum said he could not guarantee another
10 delivery until December 28. As a result, our operating priorities called for us to burn
11 penalty gas to keep the tissue machines operating, unless Puget told us that gas use by
12 Boiler No. 14 was causing gas supply pressure problems, in which case we would
13 have shut down one or more tissue machines. Because Puget dispatch did not object
14 to our burning penalty gas when we spoke on December 24, 1998, I gave the go ahead
15 to start firing the No. 14 Boiler with gas. Later, we also started firing the No. 10
16 Boiler with gas.

17 **Q. Did you take any actions to minimize use of gas beginning on December 24,**
18 **1998?**

19 A. Yes, we substantially reduced our gas use during the December 24 to 28 time period
20 by reducing the steaming rate on both boilers, resulting in lower energy production on
21 the turbine generator.

22 **Q. Can you recall any other communications with Puget during the curtailment,**
23 **other than your daily operational discussions?**

24 A. I did try to contact Puget management once on December 24. In talking with Puget
25 dispatch about the possible duration of the curtailment, I asked to speak with Puget

1 management. The dispatcher gave me a name and number of his supervisor, I
2 believe. I called the number, and there was no answer. I did receive a call from Puget
3 management on December 24. His name was “Randy,” but I don’t remember if that
4 was his first or last name. I explained our situation to him, and “Randy” did not
5 object to Kimberly-Clark burning penalty gas.

1 Safety Issues

2 **Q. If you had not used non-firm gas to fire the boilers beginning on December 24,**
3 **1998, would there have been any safety risks at the Facility?**

4 A. Yes.

5 **Q. Could you please describe the safety risks?**

6 A. A controlled shutdown can be done safely. A controlled shutdown takes roughly 18
7 hours. If we were unable to fire the boilers for a controlled shut down of the Facility,
8 then we would have an emergency shut down situation. In an emergency shut down
9 situation without fuel for the boilers, there is a risk that sulfur dioxide gas could be
10 released in the buildings and the employees would be exposed to that gas.

11 **Q. Could you give a specific example of how that could occur?**

12 A. A very good example would be if the turbine generator was to slip off line due to
13 inadequate steam supply in an uncontrolled shutdown. 700,000 pounds of steam per
14 hour are running the generator. When the turbine trips, you have 700,000 pounds of
15 steam that has to go somewhere. When that occurs, safety relief valves would lift and
16 water in the steam drum drops, which trips the No. 10 boiler. When the No. 10 boiler
17 trips, then we start losing pressure on the 825-pound header. When the 825 pound
18 header pressure is depleted to the point where it affects the 300-pound steam pressure,
19 that is where the induced draft fans and the booster fans come into play for both
20 boilers. The baghouse booster fan, which is the filter system for the No. 14 boiler,
21 that turbine would trip. That causes the baghouse booster fan to bypass the baghouse.
22 When this occurs, unfiltered flue gas from No. 14 boiler goes directly into the
23 environment. When the induced draft fan slows down, the risk of high furnace
24 pressure in the boilers is very high. No. 10 boiler flue gas is very rich in sulfur
25 dioxide. Pressurized boiler conditions would force high concentrations of sulfur

1 dioxide gas into the building. The induced draft fan slowing down on No. 14 boiler,
2 that would produce smoke to be pressurized and blow out every hole in No. 14 boiler
3 building.

4 **Q. Does this conclude your direct testimony?**

5 A. Yes.