

EXHIBIT NO. ___(LFL-15)
DOCKET NO. UE-051828/UE-051966
WITNESS: LYNN F. LOGEN

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WESTERN VILLAGE, LLC, D/B/A
WESTERN VILLAGE ESTATES,**

Complainant,

v.

PUGET SOUND ENERGY, INC.

Respondent.

Docket No. UE-051828

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY, INC.,

Respondent.

Docket No. UE-051966

**FOURTEENTH EXHIBIT TO THE PREFILED DIRECT TESTIMONY OF
LYNN F. LOGAN
ON BEHALF OF PUGET SOUND ENERGY, INC.**

MARCH 8, 2006



RATE SCHEDULE INTERPRETATION
SCHEDULE 85

RSI NO. E-85-4

Mobile Home Parks

8th Revised

Issued by:

Effective Date: 9/1/05

Tom DeBoer, Director—Rates & Regulatory Affairs

Issue Date: 12/7/05

Discussion

Mobile home parks may fall into two distinct categories when applying Schedule 85. Depending on the lot ownership, the residential or non-residential cost sections of Schedule may apply. The interpretation below should assist in making the correct application of Schedule 85 for mobile home parks.

Interpretation

Residential: A mobile home park is considered residential if the lots are or will be individually owned by the individual owners of the mobile homes. The installation of the line extension is treated same as that for platted new residential developments. Schedule 85, sheet 85-d, under *Primary and Secondary Voltage Line Extension Costs*, section 3 is used to determine the line extension costs. Schedule 85, sheet 85-e under *Secondary Voltage Service Line Costs*, section 1 is used to determine the service line costs.

Advance payment of all costs is required. A residential Margin Allowance refund toward the allowable construction costs (see RSI E-85-2) is made for each mobile home connected within the refundable period. Refunds never exceed the Customer's contribution of the allowable construction costs. Requests for refunds are processed according to Schedule 85, sheet 85-i, paragraph d).

Non-Residential: A mobile home park is considered non-residential if the individual owners of the mobile homes do not own the lots. The installation of the line extension is treated the same as construction of non-residential distribution facilities. Schedule 85, sheet 85-d, *Primary and Secondary Voltage Line Extension Costs*, section 4, is used to determine the line extension costs. Schedule 85, sheet 85-f, *Secondary Voltage Service Line Costs*, section 2 is used to determine the service line costs. The owner or developer is responsible for all UG secondary voltage line costs. If UG secondary voltage distribution lines are provided by PSE to provide a more convenient point of delivery for the Customer, the Customer will pay the estimated costs, including Lifetime O&M Costs, to provide them. UG secondary voltage distribution lines provided by PSE should terminate using a secondary handhole that provides a clear point of separation from the Customer's provided services. Secondary voltage distribution line costs are **not** considered allowable construction costs and are **not** refundable. PSE will own, operate and maintain secondary voltage distribution lines. The Customer shall be responsible for the installation, maintenance and replacement of the secondary voltage service line costs from the meter base to the handhole or transformer.

Advance payment of estimated costs (including the transformation costs) is required. A residential, full or part time, Margin Allowance refund toward the allowable construction costs is made for each mobile home connected within the refundable period. Refunds never exceed the Customer's contribution toward the allowable construction costs. Requests for refunds are processed according to Schedule 85, sheet 85-i, paragraph d.



RATE SCHEDULE INTERPRETATION
SCHEDULE 85

RSI NO. E-85-4

Mobile Home Parks

7th Revised

Issued by:

Effective Date: July 1, 2002

Karl Karzmar, Director—Regulatory Relations

Issue Date: August 1, 2003

Discussion

Mobile home parks may fall into two distinct categories when applying Schedule 85. Depending on the lot ownership, the residential or non-residential cost sections of Schedule may apply. The interpretation below should assist in making the correct application of Schedule 85 for mobile home parks.

Interpretation

Residential: A mobile home park is considered residential if the lots are or will be individually owned by the individual owners of the mobile homes. The installation of the line extension is treated same as that for platted new residential developments. Schedule 85, sheet 85-d, under *Primary and Secondary Voltage Line Extension Costs*, section 3 is used to determine the line extension costs. Schedule 85, sheet 85-e under *Secondary Voltage Service Line Costs*, section 1 is used to determine the service line costs.

Advance payment of all costs is required. A residential Margin Allowance refund toward the allowable construction costs (see RSI E-85-2) is made for each mobile home connected within the refundable period. Refunds never exceed the Customer's contribution of the allowable construction costs. Requests for refunds are processed on an annual basis only.

Non-Residential: A mobile home park is considered non-residential if the individual owners of the mobile homes do not own the lots. The installation of the line extension is treated the same as construction of non-residential distribution facilities. Schedule 85, sheet 85-d, *Primary and Secondary Voltage Line Extension Costs*, section 4, is used to determine the line extension costs. Schedule 85, sheet 85-f, *Secondary Voltage Service Line Costs*, section 2 is used to determine the service line costs. The owner or developer is responsible for all UG secondary voltage line costs. If UG secondary voltage distribution lines are provided by PSE to provide a more convenient point of delivery for the Customer, the Customer will pay the estimated costs, including Lifetime O&M Costs, to provide them. UG secondary voltage distribution lines provided by PSE should terminate using a secondary handhole that provides a clear point of separation from the Customer's provided services. Secondary voltage distribution line costs are not considered allowable construction costs and are not refundable. PSE will own, operate and maintain secondary voltage distribution lines. The Customer shall be responsible for the installation, maintenance and replacement of the secondary voltage service line costs from the meter base to the handhole or transformer.

Advance payment of estimated costs (including the transformation costs) is required. A residential, full or part time, Margin Allowance refund toward the allowable construction costs is made for each mobile home connected within the refundable period. Refunds never exceed the Customer's contribution toward the allowable construction costs. Requests for refunds are processed on an annual basis only.



**RATE SCHEDULE INTERPRETATION
SCHEDULE 85**

Line Extensions - Miscellaneous

RSI NO. E-85-4

6th Revised

Issued by:
Christy A. Omohundro—Director, Rates & Regulation

Effective Date:
May 8, 1999

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing mini-pad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

The Company may, upon request, provide total underground transformers providing:

The customer pays the full incremental cost over padmounted transformers;
and

In the Company's judgment such installations may be economically operated and maintained during their service lives.

Total underground installations required by governmental authority shall be subject to the provisions of Schedule 85, Paragraph 16, Governmental Authority.

SHORT PLATS (4 LOTS OR LESS) DEVELOPMENTS:
Schedule 85, Par. 2

Short plats will be served under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner by the developer. Short plats that do not meet this requirement or that revert to single-family status (no longer under the control of the developer) will be served under the provisions of Paragraph 1 of Schedule 85.

MOBILE HOME DEVELOPMENTS:
Schedule 85, Par. 2

Developments of mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by the individual owners of the mobile homes.

The single-family residential allowance is available for each mobile home lot where a permanent meter is installed.

**PUGET
POWER** Rate Schedule Interpretation

RSI- 85-4

SUBJECT

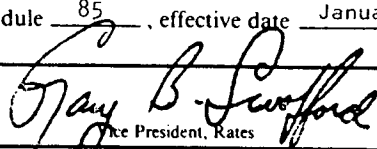
LINE EXTENSIONS - MISCELLANEOUS
RATE INTERPRETATION — SCHEDULE 85

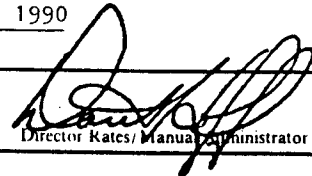
5th REVISED

references

Rate Schedule 85, effective date January 30, 1990

approvals


Vice President, Rates


Director Rates/Manual Administrator

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing mini-pad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

The Company may, upon request, provide total underground transformers providing:

The customer pays the full incremental cost over padmounted transformers, and;

In the Company's judgment such installations may be economically operated and maintained during their service lives.

Total underground installations required by governmental authority shall be subject to the provisions of Schedule 85, Paragraph 16, Governmental Authority.

SHORT PLATS (4 LOTS OR LESS) DEVELOPMENTS: Schedule 85, Par. 2

Short plats will be served under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner by the developer. Short plats that do not meet this requirement or that revert to single-family status (no longer under the control of the developer) will be served under the provisions of Paragraph 1 of Schedule 85.

MOBILE HOME DEVELOPMENTS: Schedule 85, Par. 2

Developments of mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by the individual owners of the mobile homes.

The single-family residential allowance is available for each mobile home lot where a permanent meter is installed.

0154-08

**PUGET
POWER** Rate Schedule Interpretation

RSI- 85-4

SUBJECT

LINE EXTENSIONS - MISCELLANEOUS

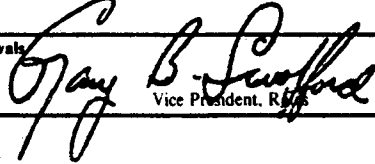
4th Revised

RATE INTERPRETATION - SCHEDULE 85

references

Rate Schedule 85, effective date January 15, 1987

approvals


Vice President, Rates


Director Rates/Manual Adjustments

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing mini-pad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

The Company may, upon request, provide total underground transformers providing:

The customer pays the full incremental cost over padmounted transformers, and;

In the Company's judgment such installations may be economically operated and maintained during their service lives.

Total underground installations required by governmental authority shall be subject to the provisions of Schedule 85, Paragraph 13, Governmental Authority.

PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be served under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner by the developer. Short plats that do not meet this requirement or that revert to single-family status (no longer under the control of the developer) will be served under the provisions of Paragraph 1 of Schedule 85.

Developments of mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by the individual owners of the mobile homes.

0154-08

**PUGET
POWER** Rate Schedule Interpretation

RSI- 85-4

SUBJECT

LINE EXTENSIONS - MISCELLANEOUS

3rd Revised

RATE INTERPRETATION - SCHEDULE 85

references

Rate Schedule 85, effective date July 18, 1986

approvals


Vice President, Rates


Director Rates/Manual Administrator

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing mini-pad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

The Company may, upon request, provide total underground transformers providing:

The customer pays the full incremental cost over padmounted transformers, and;

In the Company's judgment such installations may be economically operated and maintained during their service lives.

Total underground installations required by governmental authority shall be subject to the provisions of Schedule 85, Paragraph 12, Governmental Authority.

PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be served under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner by the developer. Short plats that do not meet this requirement or that revert to single-family status (no longer under the control of the developer) will be served under the provisions of Paragraph 1 of Schedule 85.

Developments of mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by the individual owners of the mobile homes.

0154-08

**PUGET
POWER** Rate Schedule Interpretation

RSI- 85-4

SUBJECT LINE EXTENSIONS - MISCELLANEOUS

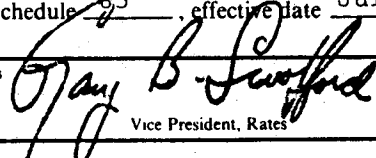
2nd Revised

RATE INTERPRETATION - SCHEDULE 85

references

Rate Schedule 85, effective date July 18, 1986

approvals


Vice President, Rates


Director Rates/Manual Administrator

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing mini-pad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

The Company may, upon request, provide total underground transformers providing:

The customer pays the full incremental cost of padmounted transformers, and;

In the Company's judgment such installations may be economically operated and maintained during their service lives.

Total underground installations required by governmental authority shall be subject to the provisions of Schedule 85, Paragraph 13, Governmental Authority.

PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be served under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner by the developer. Short plats that do not meet this requirement or that revert to single-family status (no longer under the control of the developer) will be served under the provisions of Paragraph 1 of Schedule 85.

Developments of mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by the individual owners of the mobile homes.

0154-08

**PUGET
POWER** Rate Schedule Interpretation

RSI- 85-4

SUBJECT

LINE EXTENSIONS - MISCELLANEOUS

1st Revised

RATE INTERPRETATION - SCHEDULE 85

references

Rate Schedule 85, effective date November 1, 1985

approvals

David A. Krause
Vice President Rates & Investor Relations

Martin Thompson
Director, Rate Planning/Manual Administrator

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing mini-pad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

Customers requiring total underground will pay additional vault charges as provided in Section 1.e. of Schedule 85.

PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be served under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner by the developer. Short plats that do not meet this requirement or that revert to single-family status (no longer under the control of the developer) will be served under the provisions of Paragraph 1 of Schedule 85.

Developments of mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by the individual owners of the mobile homes.

0014-08

SUBJECTLINE EXTENSIONS - MISCELLANEOUS
RATE INTERPRETATION - SCHEDULE 85

Original

referencesRate Schedule 85, effective date January 1, 1984**key words****approvals**

Dail A. Krause
Vice President Rates

Bruce B. Baker
Manager Rates, Tariffs, Manual Administrator

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing minipad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

Customers requiring total underground will pay additional vault charges as provided in Section 1.e. of Schedule 85.

PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be constructed under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner. Short plats that do not meet this requirement will be constructed under the provision of Paragraph 1 of Schedule 85.

Developments for mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by or are on long-term lease to the individual owners of the mobile homes.

SUBJECT

LINE EXTENSIONS - MISCELLANEOUS

RATE INTERPRETATION - SCHEDULE 85**references**Rate Schedule 85, effective date January 1, 1984**key words****approvals**

David A. Krause
Vice President Rates

Brian B. Baker
Manager Rates, Tariffs, Manual Administrator

SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing minipad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

Customers requiring total underground will pay additional vault charges as provided in Section 1.e. of Schedule 85.

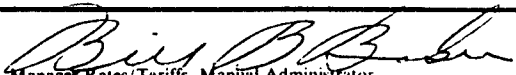
PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be constructed under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner. Short plats that do not meet this requirement will be constructed under the provision of Paragraph 1 of Schedule 85.

Developments for mobile homes will be considered as plats for the purpose of applying Paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by or are on long-term lease to the individual owners of the mobile homes.

SUBJECT

LINE EXTENSIONS - MISCELLANEOUS
RATE INTERPRETATION - SCHEDULE 85

referencesRate Schedule 85, effective date March 16, 1981Revised
May 15, 1981**key words****approvals**
Vice President Rates
Manager Rates/Tariffs, Manual Administrator**1. SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE**

Construction under this section may be either overhead or underground utilizing minipad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

Customers requiring total underground will pay additional vault charges as provided in Section 1.c. of Schedule 85.

2. PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be constructed under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner. Short plats that do not meet this requirement will be constructed under the provision of paragraph 1 of Schedule 85.

Speculative plat charges may be based on footage rates included in this section unless extraordinary conditions dictate that engineering estimates are required to protect the Company from excessive costs.

Developments for mobile homes will be considered as plats for the purpose of applying paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by or are on long-term lease to the individual owners of the mobile homes.

→ 3. NON-RESIDENTIAL

It is the intent of Schedule 85, Section 3.a., to extend distribution facilities utilizing surface-mounted transformers, across other property to serve non-residential facilities, mobile home parks, or multi-family residential structures where multiple transformation is required.

Should a non-residential customer, requiring single transformation, request extension of a primary line on his property, the customer shall pay all extension costs from the property line to the transformer location, in addition to any other costs as required by our tariffs.

080.63 5-80

SUBJECT

LINE EXTENSIONS

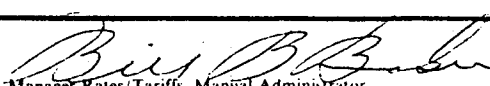
RATE INTERPRETATION - SCHEDULE 85

references

Rate Schedule 85, effective date July 1, 1980

key words

approvals


Vice President Rates
Manager Rates/Tariffs, Manual Administrator1. SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing minipad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

Customers requiring total underground will pay additional vault charges as provided in Section 1.c. of Schedule 85.

2. PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be constructed under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner. Short plats that do not meet this requirement will be constructed under the provision of paragraph 1 of Schedule 85.

Speculative plat charges may be based on footage rates included in this section unless extraordinary conditions dictate that engineering estimates are required to protect the Company from excessive costs.

Developments for mobile homes will be considered as plats for the purpose of applying paragraph 2 of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by or are on long-term lease to the individual owners of the mobile homes.

See Section 3.a. of Schedule 85 for subsurface transformer charges in non-residential applications.

INTERPRETATIONS FOR SCHEDULE 85 - LINE EXTENSIONS

1. SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing minipad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

Customers requiring total underground will pay additional charges as provided in section 1.c. of Schedule 85.

1.a.(3) REFUNDS DUE TO SUBSEQUENT CUSTOMERS

Refunds made due to connection of subsequent customers within three years shall be payable to the present owners of the property affected.

2. PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be constructed under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner. Short plats that do not meet this requirement will be constructed under the provision of paragraph 1. of Schedule 85.

Plats with lots of a size large enough to permit subdividing at a later time shall be constructed on a customer-by-customer basis as service is required under the terms of paragraph 1. of Schedule 85 or, if a developer or owner wishes to install a full system in a large-lot plat, then the parties shall enter into a refunding agreement.

Developments for mobile homes will be considered as plats for the purpose of applying paragraph 2. of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by or are on long-term lease to the individual owners of the mobile homes.

3. NON-RESIDENTIAL FACILITIES, MOBILE HOME PARKS OR MULTI-FAMILY RESIDENTIAL STRUCTURES

Selected construction should be that which will be compatible with the customer's needs, but will also recognize the most economical method from the Company's viewpoint, i.e. utilization of surface-mounted transformers to serve commercial buildings but recognizing the need to utilize total underground transformers in mobile home parks.

The Company will honor commitments to mobile home parks where we have contracts to install the secondary services until such time as those agreements are complete. The charge for secondary service lines shall be at the current filed rate.

This section now includes duplexes which were formerly considered to be single-family.

Do not include transformers when calculating costs under the five-to-one investment/revenue ratio for service under primary schedules.

Do include the cost of transformers when calculating costs under the five-to-one investment/revenue ratio for service under secondary schedules.

POINT OF DELIVERY - RESIDENTIAL

Overhead - Point of delivery is the connection of conductors at the weatherhead.

Underground - Point of delivery is at the meter base.

1-1-79

INTERPRETATIONS FOR SCHEDULE 85 - LINE EXTENSIONS

1. SINGLE-FAMILY RESIDENCES AND NOMINAL GENERAL SERVICE

Construction under this section may be either overhead or underground utilizing minipad transformers. Type of construction selected will be that which best serves the overall needs of the customer and Company's present and future system requirements.

Customers requiring total underground will pay additional charges as provided in section 1.c. of Schedule 85.

1.a.(3) REFUNDS DUE TO SUBSEQUENT CUSTOMERS

Refunds made due to connection of subsequent customers within three years shall be payable to the owner-of-record of the property affected.

2. PLATTED NEW RESIDENTIAL DEVELOPMENTS

Short plats will be constructed under this section provided they meet all of the requirements of regular plats, in that all improvements required by local zoning are installed in a coordinated manner. Short plats that do not meet this requirement will be constructed under the provision of paragraph 1. of Schedule 85.

Plats with lots of a size large enough to permit subdividing at a later time shall be constructed on a customer-by-customer basis as service is required under the terms of paragraph 1. of Schedule 85 or, if a developer or owner wishes to install a full system in a large-lot plat, then the parties shall enter into a refunding agreement.

Developments for mobile homes will be considered as plats for the purpose of applying paragraph 2. of Schedule 85 when the plat meets all the requirements for constructed residences and the lots are individually owned by or are on long-term lease to the individual owners of the mobile homes.

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POINT OF DELIVERY - RESIDENTIAL

Overhead - Point of delivery is the connection of conductors at the weatherhead.

Underground - Point of delivery is at the meter base.

10/77