

EXHIBIT NO. ___(LFL-16)
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

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

MARCH 8, 2006



Puget Sound Energy, Inc.
P.O. Box 90888
Bellevue, WA 98008-0888

July 8, 2005

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Mr. Doug Anderson
Property Manager
Western Village Mobile Home Park

Dear Mr. Anderson,

This letter is to provide notice that on October 21, 1977 the ownership, as well as the responsibility for maintenance and replacement of service lines in all mobile home parks changed to be the responsibility of the customer. This change in ownership and responsibility occurred through the approval by the Washington Utilities and Transportation Commission ("WUTC") of a change in the tariff of Puget Sound Power & Light Company (now Puget Sound Energy). The provision that became effective on October 21, 1977 was: "The Customer shall install, own and maintain all secondary underground service facilities beyond the secondary termination at the transformer or handhole." This same provision is still in effect today (with minor changes in wording) and says: "The Customer shall be responsible for ownership and operation of all underground services and for all costs of installation, maintenance, and replacement thereof."

A "service line" is the electrical line that extends from the Puget Sound Energy owned transformer or secondary voltage handhole to the meter pedestal or other connection at the trailer.

The tariff of utilities, once approved by the WUTC has the force and weight of State law. There is no choice on whether or not there was an ownership change, because the ownership change happened through an approved tariff. For example, if the speed limit was changed from 70 mph on the freeway to 55 mph we would have no choice whether or not to accept the change. If we go 70 mph we are violating the law. The same would be true in the case of ownership of services in mobile home parks, the ownership was, in effect, changed by law.

At 225 NE Ernest St. Space # 57, Oak Harbor there is an underground service to a mobile home that failed on June 21st. At that time we installed an auto-transformer which is used to restore full power until repairs can be made to the customer as a temporary fix. A splice vault which PSE owns and maintains needed to be upgraded so it could be determined if the voltage problem was in the service to the mobile or if it was in our splice vault. The morning of June 22, a Potelco crew replaced and repaired the PSE splice vault and at that time it was determined the underground service to the mobile home at space #57 had failed and needed to be repaired by an electrician.

With that being said it is now time we recapture our auto-transformer as we only have a couple of them and they are used frequently. Normally when this occurs, the Mobile Park owner hires an electrician to make repairs to the service and at the same time we remove our temporary equipment and everyone is back in service.

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Mr. Anderson, from our phone conversation, I understand you don't agree that repairing the underground wire is your responsibility. To resolve this situation, I'm offering for PSE to schedule our Service Provider, Potelco to make repairs to the service. At that time we'll recapture our temporary equipment so it will be available for other customers. Per our tariff as described above, PSE will bill you our cost to hire Potelco to make repairs to your underground wire. You may want to consider the cost, if you were to hire an electrician it would most likely be less costly than us billing you for the repairs.

If I don't hear from you by Thursday, July 14, we'll move ahead with our plan to have Potelco make repairs and you will be billed all cost associated with the repair. You may reach me at my office phone: 360-707-7534 or my cell phone: 360-815-0771, please leave a message if I'm not available and I'll promptly return your call.

Thank you,

Wes Gibbs
gr.

Wes Gibbs
Supervisor Electric First Response
Skagit Service Center
18601 Andis Rd
Burlington, WA 98233

Cc: Dr. Aldo Venier