



PUGET  
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ENERGY

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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

August 19, 2005

Ms. Carole Washburn, Secretary  
Washington Utilities & Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504

Dear Ms. Washburn:

**Subject: Docket UG-920781 (WNG)  
Docket UE-911476 (PSP&L)  
Report on Environmental Issues for the period ending June 30, 2005**

## **FORMER WNG SITES**

### **A. Tacoma Gas Company Site (Upland Source Control)**

PSE is working with WDOE to develop an RI/FS and CAP/EDR documents for addressing portions of the site under the I-705 overpass. Periodic groundwater monitoring continues.

Remedial costs incurred through 6/30/05	\$ 720,154
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### **B. Thea Foss Waterway**

Remedy construction is complete. Monitoring of the utilities' remedy began in April 2004, as required by the agency approved Operation Maintenance and Monitoring Plan (OMMP). During the fall of 2004, recontamination of the Utilities' Work Area was discovered. The recontamination source was identified to be dredging completed by the City of Tacoma. The Utilities are working with EPA, WDOE and the City of Tacoma to address the "dredging" recontamination issue. Any necessary remedial work would be conducted during the upcoming construction season (August 2005 to February 2006).

Sampling of the sediment was performed in early Summer 2005 in accordance with the OMMP.

Remedial costs incurred through 6/30/05	\$ 2,880,597
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### **C. Everett, Washington**

PSE continues regular monitoring of the results of the remediation already performed. The remedy chosen for this site was a containment wall with monitoring wells at both ends.

Remedial costs incurred through 6/30/05	\$ 1,244,045
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#### **D. Chehalis, Washington - Gas Site**

Work has continued on developing a remedial plan (RI/FS) resulting from the discovery of elevated concentrations of contamination onsite. Due to this discovery we now believe that the potential range of costs shown below more accurately reflects the range of risks faced by PSE at this site.

Remedial costs incurred through 6/30/05	\$ 2,415,105
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#### **E. Gas Works Park**

No change. The only ongoing activity is the monitoring of the remediation. This is the responsibility of the City of Seattle.

Remedial costs incurred through 6/30/05	\$ 2,573,828
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#### **F. 5<sup>th</sup> and Jackson**

Union Station Associates and PSE settled the pending litigation in December 2002. We are still working with our insurance carriers to recover costs associated with the defense and settlement of this litigation.

Total investigative and settlement costs through 6/30/05	\$ 2,001,000
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#### **G. Quendall Terminals**

There has been virtually no communication with PSE regarding this site for a few years. PSE has attempted to monitor activities, and we continue to deny liability. However, given the current estimate of costs, allegations by other parties, and our ongoing investigation, it remains difficult to estimate project costs. Historically, we have simply referenced the \$1,000,000 demand tendered by the City of Renton. However, we now believe that a potential range of costs more accurately reflects the risks faced by PSE at this site.

#### **H. Lake Union**

PSE is conducting a remedial investigation/feasibility study under the Agreed Order (AO) between WDOE and PSE and the City of Seattle executed on March 18, 2005. The AO calls for PSE and the City to complete work in separate eastern and western study areas offshore of Gas Works Park. PSE has completed the majority of the field investigation, including supplemental sampling to establish the cleanup boundary and cleanup level. A decision from WDOE regarding the cleanup boundary and level is anticipated by the end of July. Remedial investigation/feasibility studies will continue throughout the remainder of 2005.

Remedial costs incurred through 6/30/05	\$ 3,880,113
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## **I. Tacoma Tar Pits**

The pump and treat system is operating and PSE continues to monitor system performance. Maintenance of site facilities (e.g., mowing of covered stabilized waste pile) and monitoring of ground water quality continues.

Remedial costs incurred through 6/30/05	\$ 36,892,567
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## **FORMER PUGET POWER SITES**

### **A. Northwest Transformer, Mission Pole**

PSE monitors this site, but it has very little additional activity following the completed remediation.

### **B. Puyallup Garage**

PSE expects to perform remediation at this site in the future, but is presently monitoring the property only. Contaminated soil remains beneath the former garage building.

### **C. Underground Storage Tanks Status**

Please see the attached spreadsheet. This provides a summary of our ongoing efforts associated with the investigation, remediation, and/or removal of underground storage tanks. Please note that the Crossroads Business Office UST-related cleanup and our estimate of related costs are described in item J above. The estimate of future expenditures in this category has been adjusted accordingly.

### **D. Buckley Headworks Site**

#### Phase 1

Remediation of the first area of investigation was completed in 2002 in accordance with MTCA and WDOE has provided a No Further Action Letter. This phase of the project is completed and PSE has pursued insurance recovery for costs associated with the remediation of the wood treatment facility area.

Costs incurred thus far are substantially associated with our efforts to remediate this portion of the facility. As of 6/30/04, the total costs incurred are \$2,304,499.59. However, costs incurred after 6/30/03 are associated with monitoring the work already completed.

#### Phase 2

PSE continues to investigate three other areas noted during our initial remediation work that will require remediation. The groundwater monitoring program was recently expanded to assess the full extent of impacts.

The full nature and cause of issues identified in these areas is not yet fully known.

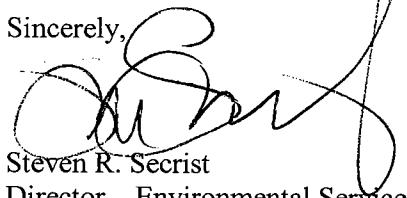
Remedial costs incurred through 6/30/05	\$79,240
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#### **E. Duwamish Waterway (Potential New Site)**

While PSE has not been formally designated as a PLP for this site in south Seattle, allegations have been made by other parties that PSE may have contributed to contamination in this Waterway as a result of the operations of a steam plant in the Georgetown area. It remains premature to determine either the merit of these claims or the amount of any formal claim that may be brought against PSE.

This list represents current major sites PSE is investigating, monitoring, or remediating.

Sincerely,



Steven R. Secrist  
Director – Environmental Services

#### Attachments

cc: Jim Eldredge  
Mike Main  
Karl Karzmar  
Bert Valdman  
Chuck Gordon  
David Brenner  
Mike Stranik  
Jennifer O'Connor  
Mark Raker

**PUGET SOUND ENERGY, INC.**  
**DEFERRED ENVIRONMENTAL COST SUMMARY ELECTRIC**  
**JUNE 30, 2005**

September 2000 forward SAP ORDER	SAP ACCOUNT	SITE DESCRIPTION	3/31/2005		6/30/2005		Env Services Project Cost Estimates		Remediation Cost Estimates Remaining		Inception To-Date Ins Proceeds		Accum Amort Through 1st Qtr Dr. 6/30/2005		Balance 6/30/2005 Closing			
			Account Balance (a)	Quarterly Activity (b)	Account Balance (c)=(a)+(b)	8/31/2005 (58,186.14) (E)	814,805.72	1,437,738.91 (16,979.31)	1,420,759.60 79,240.40	1,500,000.00 1,500,000.00	1,500,000.00 1,500,000.00	1,420,759.60 1,420,759.60	0.00	(1,140,777.03)	(349,118.84)	814,605.72	(h)=(a)+(b)	
18230007	18232241	Buckley Phase 1-Wood Treatment Area Env Remed Cost (Amortization began 1/1/04)	872,791.86	(58,186.14) (E)	814,805.72													
18232221	18232251	Env Rem- Buckley-White River Phase II Future Est Cost Buckley Phase II-Burn Pile & Wood Debris Env Rem Cost	1,437,738.91 62,281.09	(16,979.31) 0.00	1,420,759.60 79,240.40											1,420,759.60 79,240.40		
		<b>SUBTOTAL BUCKLEY HEADWORKS SITE</b>	<b>1,500,000.00</b>														<b>1,500,000.00</b>	
18233081	18232281	Env Rem - Olympia SVC Capacitor Site Future Est Cost Env Rem - Olympia SVC Capacitor Site (Amort began 11/1/04)	23,125.24 428,874.76	(23,125.24) (58,916.64) (D)	0.00 399,958.12											56,916.64 399,958.12		
		<b>SUBTOTAL OLYMPIA SVC CAPACITOR SITE</b>	<b>450,000.00</b>													<b>399,958.12</b>		
18230021	18232271	Env Rem - Duwamish River Site (former Georgetown)	56,800.68		56,800.68 (A)											56,800.68		
	18232291	Env Rem - UG Tank - Bellevue G.O. Future costs UG Tank - Bellevue G.O. (future costs, ins. net of expenditures)	50,000.00 (141,634.19)	(50,000.00) 141,634.19	0.00 0.00											0.00 0.00		
22840091	22840091		<b>(91,634.19)</b>	<b>91,634.19</b>	<b>0.00</b>											<b>0.00</b>	<b>0.00</b>	
18230011	18233051	Env Rem - UG Tank - Baker Lodge (Amortization began 6/1/03)	8,513.48	(872.12) (E)	7,841.36											(5,600.98)	7,841.36	
	18233061	Env Rem - UG Tank - Poulsbo Service Center (future costs)	10,000.00		10,000.00											10,000.00		
18230031	18233071	Env Rem - UG Tank - Kent Fleet (Amortization began 5/1/01)	19,081.11	(4,398.72) (E)	14,662.39											(73,312.00)	14,662.39	
	22840011	NWT - Mission Pole Def Site	(75,000.00)		(75,000.00)											(75,000.00)		
	22840021	Buckley White River Phase II Def Site	(1,437,738.91)		16,979.31											(1,420,759.60)		
	22840031	Olympia UST Def Site	(129,471.05)		(129,471.05)											(129,471.05)		
	22840041	Bremerton UST Def Site	(3,273.81)		(3,273.81)											(3,273.81)		
	22840042	Whidbey Island UST Def Site	(15,000.00)		(15,000.00)											(15,000.00)		
	22840051	Tenino UST Def Site	(52,471.63)		(52,471.63)											(52,471.63)		
	22840061	Puyallup Garage expenses Site	(337,416.92)		(337,416.92)											(337,416.92)		
	22840081	Poulsbo Service Center	(10,000.00)		(10,000.00)											(10,000.00)		
	22840111	Olympia SVC Capacitor Def Site	(23,125.24)		23,125.24											0.00		
	22840121	AETNA II Lawsuit unallocated proceeds	(1,481,763.38)		(100,000.00) (C)											(1,581,763.38)		
	22841001	<b>Totals</b>	<b>(739,728.00)</b>		<b>(111,580.12)</b>											<b>(3,437,500.00)</b>	<b>(371,113.17)</b>	
																<b>(851,288.12)</b>		

(A) Per Eldredge discussion with Steve Sechrist on July 7, 2005, remediation of the Dumamish site is taking place at this time. PSE's obligations, if any, with regard to this site are uncertain at this time.

(B) All future cost estimate for this site has been received in the form of insurance proceeds.

(C) Allocate back Astra II lawsuit of insurance proceeds due to sale of Bellevue General Office facility.

(D) Catch up amortization adjustment began November 1, 2004.

(E) Amount is equal to the quarterly amortization.

(F) Property was sold and new owners will be responsible for future remediation of this site.

PUGET SOUND ENERGY, INC.  
DEFERRED ENVIRONMENTAL COST SUMMARY GAS  
June 30, 2005

September 1998 - forward SAP ORDER SAP ACCOUNT	Site Description	3/31/2005 Account Balance	Activity	0/30/2005 Account Balance	Env Services Project Cost Estimates 6/30/2005 (d)	Remediation Cost Estimates Remaining 18608022 18236022 22840002	Amortization Through 6/30/05 Dr. 40700002	Balance 8/30/05 Closing
<b>FORMER MANUFACTURED GAS SITES:</b>								
18601203	18608142	TACOMA TIDE FLATS (TACOMA TAR PITS, THCGS, RIVER STREET)	9,351,936.58	-	9,351,936.58	9,351,936.58		
18601102	18608112	Legal Costs	34,826,945.66	(0)	34,826,945.66	34,826,945.66		
18601102	18608112	Remediation Costs through June 1998	2,020,225.88	(0)	2,065,821.81	2,065,821.81		
18601102	18608112	Internal Costs post-June 1998	208,786.52		209,796.52	209,796.52		
		SUBTOTAL Tacoma Tide Flats	46,408,904.67		46,395.83	46,395.83		
18602102	186080812	EVERETT	1,243,820.58	225.00	1,244,045.58	1,455,654.42	1,244,045.58	
18602203	186080842	Remediation Costs	8,717.50		8,717.50	8,717.50		
		SUBTOTAL Everett	1,252,538.08		225.00	1,252,763.08	1,252,763.08	
18603102	186080312	CHEHALIS	2,328,348.81	65,563.43	2,415,105.24	884,694.76	2,415,105.24	
		Remediation Costs						
18604203	186080442	GAS WORKS - SEATTLE	881,434.75	(25,313.64)	856,121.11	856,121.11		
18604102	186080412	Legal Costs	2,673,828.37	(86,83)	2,573,728.54	2,573,728.54		
18604102	186080452	Remediation Costs	366.95		366.95	366.95		
		Internal Costs - pre-1987						
		SUBTOTAL Gas Works - Seattle	3,455,630.07		(25,413.47)	3,430,216.60	3,430,216.60	
18605203	186080542	WSDOT FEDERAL/STATE	379,591.40		379,591.40	379,591.40		
18605102	186080512	Legal costs						
		Remediation Costs						
		SUB TOTAL	379,591.40					
18606102	186080612	WSDOT UPLAND (aka 22nd & A Street, Tacoma Gas Company Site)	713,043.36	7,111.63	720,154.99	1,100,000.00	379,845.01	720,154.99
18606203	186080642	Remediation Costs	15,888.20		15,888.20			15,888.20
		SUBTOTAL	728,931.56		736,043.19			736,043.19
18607102	186080712	WSDOT THEA FOSS	2,803,223.07	77,374.43	2,880,597.50	2,880,597.50		
18607203	186080742	Remediation costs	2,827,842.31	33,000.51	2,860,842.62	2,860,842.62		
		Legal costs	5,631,065.38		5,741,440.32	5,741,440.32		
		SUBTOTAL						
18608102	186080812	TULALIP	995.00		995.00			995.00
		Remediation costs						
18609202	186080942	OMNIBUS INSURANCE LITIGATION (9 MFG. GAS SITES)	3,024,304.29	(602,355.83)	2,421,948.46	2,421,948.46		
		Legal costs						
		SUBTOTAL	0.00		1,090,684.42	-		1,090,684.42
18610102	186080912	5TH & JACKSON	2,382,234.26	(381,234.26)	2,001,000.00	2,001,000.00		
18610104	1860809132	Remediation costs	1,196,863.98	381,234.26	1,578,098.24	1,578,098.24		
18610103	1860809122	Legal cost recoveries	(1,413,413.82)	-	(1,413,413.82)	(1,413,413.82)		
18610105	1860809142	Indemnity Insurance Proceeds	(1,075,000.00)	-	(1,075,000.00)	(1,075,000.00)		
		SUBTOTAL	1,090,684.42		-			

PUGET SOUND ENERGY, INC.  
DEFERRED ENVIRONMENTAL COST SUMMARY GAS  
June 30, 2005

4/08/2005  
Mark Grieser