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BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

NO. PG-041624

PUGET SOUND ENERGY'S ANSWER
TO THE COMPLAINT

1. Puget Sound Energy, Inc. ("PSE") hereby answers the Complaint of the Washington Utilities and Transportation Commission ("Commission") as follows.

I. PARTIES

2. PSE admits the allegations in paragraph 2.

3. PSE admits that it is an electrical and gas company subject to regulation by the Commission but has insufficient information to admit or to deny each other or different allegation in paragraph 3.

II. JURISDICTION

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3 4. PSE admits that the Commission has jurisdiction over PSE and over the
4 subject matter of the Complaint. PSE denies each other or different allegation in paragraph
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9 5. Paragraph 5 calls for a legal conclusion; therefore, no response is required.

III. FACTUAL ALLEGATIONS

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12 6. PSE admits the allegations in paragraph 6.

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14 7. PSE admits the allegations in paragraph 7.

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16 8. PSE admits the allegations in paragraph 8.

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18 9. PSE admits the allegations in paragraph 9.

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20 10. PSE admits the allegations in paragraph 10.

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22 11. PSE admits the allegations in paragraph 11.

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24 12. PSE admits that the service line to the house was protected by a cathodic
25 protection system, but denies that the service line to the house was designed to be protected
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27 by a cathodic protection system. PSE admits the remaining allegations in paragraph 12.
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31 13. PSE admits the allegations in paragraph 13.

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33 14. PSE admits that the leak in the service pipe was caused by corrosion, but
34 further states that it is as yet unknown what caused the corrosion.
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37 15. PSE admits the allegations in paragraph 15.

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39 16. PSE admits the allegations in paragraph 16.

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41 17. PSE admits the allegations in paragraph 17, except that the rectifier was
42 designed to provide cathodic protection to an area containing approximately 2,600 homes
43 served with natural gas by PSE.
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IV. ALLEGED RULE VIOLATIONS

18. Paragraph 18 requires no response.

19. PSE admits the allegations in paragraph 19.

20. PSE admits the allegations in paragraph 20.

21. PSE denies the allegations in paragraph 21.

22. PSE has insufficient information to admit or deny the allegations of paragraph 22.

V. AN EMERGENCY ADJUDICATIVE PROCEEDING SHOULD BE CONVENED

23. PSE admits the allegations in paragraph 23.

24. PSE denies the allegations in paragraph 24.

25. PSE denies the allegations in paragraph 25.

26. PSE denies the allegations in paragraph 26.

27. Paragraph 27 does not require a response.

28. Paragraph 28 calls for a legal conclusion and therefore requires no response.

VI. RELIEF SOUGHT

29. PSE and the Commission Staff have submitted an Agreed Submission that includes agreed points of relief based on paragraph 29. PSE denies the claims for relief in paragraph 29 that are different from those points of relief in the Agreed Submission.

30. PSE admits the allegations in paragraph 30.

31. PSE admits the first sentence of paragraph 31. PSE denies the remaining allegations in paragraph 31.

32. PSE admits the allegations in paragraph 32.

33. PSE admits the allegations in paragraph 33.


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 17, 2004, I served a copy of **PUGET SOUND ENERGY'S ANSWER TO THE COMPLAINT** via facsimile and U.S. Mail, postage prepaid on the following:

Donald T. Trotter
Assistant Attorney General
1400 South Evergreen Park Drive Southwest
P.O. Box 40128
Olympia, Washington 98504-0128
Fax: (360) 586-5522

City of Bellevue
Lori Molander-Riordan
Deputy City Attorney
City Attorney's Office
P.O. Box 90012
Bellevue, Washington 98009-9012
Fax: (425) 452-7256



Anne L. Unckles