



Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

August 9, 2005

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Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Attn: Alan Rathbun

Subject: Cast Iron Replacement 2005 Semi-Annual Report (Docket No. UG-920487)

Dear Mr. Rathbun:

Pursuant to Docket No. UG-920487, Puget Sound Energy (PSE) is required to submit semi-annual status reports reflecting the progress of the cast iron retirement program. This letter provides the status for cast iron retirement footage for 6 months ending June 30, 2005 and the cumulative retirement footage since the inception of the program.

In the first half of 2005, PSE completed the retirement of 26,224 feet of cast iron and is on target to achieve the planned retirement footage for the year. In total, PSE has retired 1,363,616 feet of cast iron pipe. For easy reference, the footages are itemized in the attached table.

If you have any questions, please call me at 425-462-3748.

Sincerely,

Kaaren Daugherty, PE
Consulting Engineer, Standards and Compliance

Cc: Kimberly Harris
Karl Karzmar
Sue McLain
Booga Gilbertson
Duane Henderson
Jim Hogan

Enclosures

RMS
TA

CAST-IRON RETIREMENT
Semiannual Status Report
6 Months Ending 6/30/05

	2005 SETTLEMENT YEAR	CUMULATIVE RETIREMENT			
	PLANNED RETIREMENT* FOR SETTLEMENT YEAR	ACTUAL RETIREMENT ENDING 6/30/05	INCEPTION (JUNE 18, 1992) TO DATE	TARGET RETIREMENT* THROUGH 12/05	ACTUAL RETIREMENT ENDING 6/30/05
SEATTLE BUSINESS AREA					
-Downtown Seattle Abandoned	0	0	23,239	23,239	
-Downtown Seattle Replaced	0	0	56,388	56,388	
<i>SUBTOTAL: Retirement in Downtown Seattle</i>	0	0	79,627	79,627	
-Retirement in remaining Seattle Business Area	0	0	398,608	398,608	
<i>TOTAL: Retirement in Seattle Business Area</i>	0	0	478,235	478,235	
OUTSIDE SEATTLE BUSINESS AREA					
<i>TOTAL: Retirement Outside Seattle Business Area</i>	49,236	26,224	908,393	885,391	
TOTAL CAST-IRON RETIREMENT	49,236	26,224	1,386,628	1,363,616	

* These retirement footages are based on the schedule submitted to the WUTC in the 2002 Annual Status Report.

Annual Status Report

YEAR	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	TOTAL
<i>FORMER SCHEDULE - (July 31, 1997)</i>																
DOWNTOWN REPLACEMENT	10,564	10,663	11,668	10,210	8,423	0	0	5,100	0	0	0	0	0	0	0	56,568
DOWNTOWN ABANDONMENT	7,127	7,314	4,415	3,090	1,140	0	0	0	0	0	0	0	0	0	0	23,086
TOTAL DOWNTOWN SEATTLE	17,691	17,977	16,083	13,300	9,563	0	0	5,100	0	0	0	0	0	0	0	79,654
REMAINING SEATTLE BUSINESS AREA	43,966	34,926	42,748	42,888	35,235	50,435	49,975	48,500	50,240	0	0	0	0	0	0	401,280
TOTAL WITHIN SEATTLE BUSINESS AREA	61,597	52,273	61,831	56,188	44,798	50,435	49,975	53,600	50,240	0	0	0	0	0	0	480,934
TOTAL OUTSIDE SEATTLE BUSINESS AREA	75,092	45,660	82,044	61,643	66,111	50,301	49,150	44,550	51,970	97,047	97,047	97,047	97,047	97,047	97,044	1,108,800
TOTAL CAST-IRON REPLACEMENT	136,689	97,933	143,875	117,831	110,909	100,736	99,125	98,150	102,210	97,047	97,047	97,047	97,047	97,047	97,044	1,589,734
CUMULATIVE REPLACEMENT	36,689	234,622	378,497	496,329	607,234	707,970	807,095	905,245	1,007,455	1,104,502	1,201,549	1,298,596	1,395,643	1,492,690	1,589,734	

<i>CURRENT SCHEDULE - As of December 31, 2003</i>																
DOWNTOWN REPLACEMENT	10,564	10,663	11,668	10,210	8,423	0	0	4,920	0	0	0	0	0	0	0	56,388
DOWNTOWN ABANDONMENT	7,127	7,314	4,415	3,090	1,140	0	0	0	0	0	0	0	0	0	0	23,299
TOTAL DOWNTOWN SEATTLE	17,691	17,977	16,083	13,300	9,563	0	0	4,920	0	0	0	0	0	0	0	79,687
REMAINING SEATTLE BUSINESS AREA	43,966	34,926	42,748	42,888	35,235	41,714	60,788	48,546	43,850	3,680	153	0	0	0	0	98,608
TOTAL WITHIN SEATTLE BUSINESS AREA	61,597	52,273	61,831	56,188	44,798	41,714	60,788	51,466	43,850	3,680	153	0	0	0	0	478,235
TOTAL OUTSIDE SEATTLE BUSINESS AREA	75,092	45,660	82,044	61,643	66,111	64,471	38,098	41,105	67,213	97,439	121,201	105,079	49,236	80,000	54,921	1,043,314
TOTAL CAST-IRON REPLACEMENT	136,689	97,933	143,875	117,828	110,909	106,185	98,886	92,572	111,043	95,039	121,544	105,079	49,236	80,000	54,921	1,521,549
CUMULATIVE REPLACEMENT	36,689	234,622	378,497	496,325	607,234	713,419	812,305	904,877	1,013,920	1,119,959	1,232,213	1,337,292	1,386,628	1,466,628	1,521,549	
OVER/UNDER PLANNED FOOTAGE						5,449	5,210	268	8,465	6,457	30,764	38,795	0	0	0	
ACTUAL																
TARGET																