



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

January 31, 2006

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 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 12 months ending December 31, 2005 and the cumulative retirement footage since the inception of the program.

In 2005, PSE completed the retirement of 62,539 feet of cast iron, 13,303 feet more than planned. Over the life of the program, PSE has retired a total of 1,399,931 feet of cast iron pipe. For easy reference, the footages are itemized in the attached table.

Also attached is an updated schedule indicating the planned annual retirement for the remaining eighteen months of the program based upon the most current estimate of the remaining footage.

If you have any questions, please call me at 425-462-3957.

Sincerely,

A handwritten signature in black ink that appears to read "Hogan".

Jim Hogan
Manager, Standards and Compliance

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

Enclosures

Dave L
Scott R.
Rec.ctr
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Annual Status Report

YEAR	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	TOTAL
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FORMER SCHEDULE - (July 31, 1997)

DOWNTOWN REPLACEMENT	10,504	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	17,631	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	34,296	45,748	42,885	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	56,185	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	117,828	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	136,689	234,622	378,497	496,325	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	

CURRENT SCHEDULE - As of December 31, 2005

DOWNTOWN REPLACEMENT	10,504	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	153	0	0	0	0	23,239
TOTAL DOWNTOWN SEATTLE	17,631	17,977	16,083	13,300	9,563	0	0	4,920	0	0	153	0	0	0	0	79,627
REMAINING SEATTLE BUSINESS AREA	43,966	34,296	45,748	42,885	35,235	41,714	60,788	46,546	43,830	3,600	0	0	0	0	0	398,608
TOTAL WITHIN SEATTLE BUSINESS AREA	61,597	52,273	61,831	56,185	44,798	41,714	60,788	51,466	43,830	3,600	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	41,106	67,213	91,439	121,201	105,079	62,539	80,000	50,212	1,051,908
TOTAL CAST-IRON REPLACEMENT	136,689	97,933	143,875	117,828	110,909	106,185	98,886	92,572	111,043	95,039	121,354	105,079	62,539	80,000	50,212	1,530,143
CUMULATIVE REPLACEMENT	136,689	234,622	378,497	496,325	607,234	713,419	812,305	904,877	1,015,920	1,110,959	1,232,313	1,337,392	1,399,931	1,479,931	1,530,143	
OVER/UNDER PLANNED FOOTAGE						5,449	5,210	-368	8,465	6,457	30,764	38,796	4,288	0	0	

ACTUAL	
TARGET	

CAST-IRON RETIREMENT
Semiannual Status Report
12 Months Ending 12/31/05

	2005 SETTLEMENT YEAR		CUMULATIVE RETIREMENT INCEPTION (JUNE 18, 1992) TO DATE	
	PLANNED RETIREMENT* FOR SETTLEMENT YEAR	ACTUAL RETIREMENT ENDING 12/31/05	TARGET RETIREMENT* THROUGH 12/05	ACTUAL RETIREMENT ENDING 12/31/05
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>				
-Retirement in remaining Seattle Business Area	0	0	79,627	79,627
<i>TOTAL: Retirement in Seattle Business Area</i>	0	0	398,608	398,608
OUTSIDE SEATTLE BUSINESS AREA				
<i>TOTAL: Retirement Outside Seattle Business Area</i>			478,235	478,235
	49,236	62,539	908,393	921,696
TOTAL CAST-IRON RETIREMENT	49,236	62,539	1,386,628	1,399,931

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