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Bellevue, WA 98009-0868

July 26, 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 2006 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, 2006 and the cumulative retirement footage since the inception of the program.

In the first half of 2006, PSE completed the retirement of 36,444 feet of cast iron and is on target to achieve the planned retirement footage for the year. In total, PSE has retired 1,436,375 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 425-462-3957.

Sincerely,

Jim Hogan
Manager, Standards and Compliance

Enclosures

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

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CAST-IRON RETIREMENT
 Semiannual Status Report
 6 Months Ending 6/30/06

	2006 SETTLEMENT YEAR		CUMULATIVE RETIREMENT INCEPTION (JUNE 18, 1992) TO DATE	
	PLANNED RETIREMENT* FOR SETTLEMENT YEAR	ACTUAL RETIREMENT ENDING 6/30/06	TARGET RETIREMENT* THROUGH 12/06	ACTUAL RETIREMENT ENDING 6/30/06
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>	80,000	36,444	1,001,696	958,140
TOTAL CAST-IRON RETIREMENT	80,000	36,444	1,479,931	1,436,375

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