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BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION

IN THE MATTER OF:

WESTERN VILLAGE, LLC,  
Petitioner/Complainant  
v.  
PUGET SOUND ENERGY, INC.  
Respondent

DOCKET NO. UE-51828  
DECLARATION OF DOUG  
ANDERSON

Doug Anderson declares:

1. I am a manager of Western Village, LLC d/b/a Western Village Estates ("the Community"), a manufactured home community located at 225 N.E. Ernst Street, Oak Harbor, Island County, Washington 98277 (the "Premises").
2. The Community was built in 1973. The Park is comprised of 128 individual lots which are rented to its residents pursuant to a written rental agreement for purposes of the placement of the residents' manufactured homes in which they reside.
3. At the time the Community was built, the Community was not master metered for electrical service provided by Puget Sound Energy, Inc. ("PSE") or its predecessor. Instead, PSE provided, and continues to provide, electrical service directly to the residents of the Community for which PSE bills each individual

DECLARATION OF DOUG ANDERSON- 1

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1 resident who is provided electrical service.

2 4. The residents of the Community are PSE's customers.

3 5. I believe that PSE bills the residents of the Community at a residential  
4 rate which is set by PSE's Tariff in an amount to recapture, PSE's expense to repair,  
5 maintain, and replace service facilities at the Premises.

6 6. PSE owns, operates and maintains all electrical service facilities at  
7 each resident's lot in the Community.

8 7. Each resident's manufactured home at the Community connects to  
9 PSE's service facilities for purposes of receiving electrical service.

10 8. PSE's electrical service facilities at each resident's lot connects to  
11 service facilities which were installed by PSE or its predecessors, and which have  
12 been maintained and replaced by PSE at all times relevant to this matter.

13 9. The electrical service facilities between PSE's service facilities at each  
14 resident's lot and PSE's transformers at the Premises must be and have been  
15 repaired, maintained, and replaced from time to time.

16 10. Neither the Community nor residents of the Community had any  
17 control over how the electrical service facilities were installed by PSE or its  
18 predecessors at the Premises. As a result of electric equipment and/or electric  
19 facility deterioration, residents of the Community have experienced trouble with the  
20 electrical service at the Community since 1973.

21 11. If the Community or the residents had initially installed the electrical  
22 service facilities at the Premises, they could have taken measures to protect the  
23 electrical service facilities from deterioration. Neither the Community nor its  
24 residents had any control over how the electrical service facilities were installed.

25 12. Neither the Community or its residents were allowed to participate in  
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DECLARATION OF DOUG ANDERSON- 2

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1 the maintenance of the electrical service facilities over time. The current and future  
2 problems with the electrical service facilities are due to causes beyond either the  
3 Community's or its residents' control.

4 13. Neither the Community or its residents should be responsible for the  
5 repair, maintenance, or replacement of the electrical service facilities, owned by  
6 PSE, and maintained by PSE, at the Premises.

7 14. At all times relevant to this action, PSE and its predecessors have  
8 accessed, repaired, maintained, and replaced the electrical service facilities between  
9 PSE's service facilities at each resident's lot, and PSE's transformers at the  
10 Premises.

11 15. PSE now disclaims responsibility and refuses to access, repair,  
12 maintain, or replace PSE owned electrical service facilities between PSE's service  
13 facilities at each resident's lot and PSE's transformers at the Premises. In refusing  
14 to access, repair, maintain, and replace the electrical service facilities at the  
15 Premises, PSE has not provided service as required under Washington law.

16 16. Unless the electrical service facilities owned by PSE at the Premises  
17 are repaired, maintained, or replaced, I believe that the service facilities will  
18 continue to deteriorate and the residents of the Community will continue to  
19 experience problems with their electrical service.

20 17. Attached as Exhibit A is a true and correct copy of Puget Sound  
21 Energy Electric Tariff G, Schedule 80 General Rules and Provisions, that I obtained  
22 from the records custodian at the Washington Utilities and Transportation  
23 Commission.

24 18. Attached as Exhibit B is a true and correct copy of Puget Sound  
25 Energy Electric Tariff G, Schedule 85 Line Extensions, that I obtained from the  
26

DECLARATION OF DOUG ANDERSON- 3

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1 records custodian at the Washington Utilities and Transportation Commission.

2 19. Attached as Exhibit C is a true and correct copy of Puget Sound  
3 Power and Light Company Electric Tariff C, Schedule 85 Line Extensions, that I  
4 obtained from the records custodian at the Washington Utilities and Transportation  
5 Commission.

6 20. Attached as Exhibit D is a true and correct copy of Puget Sound  
7 Power and Light Company Electric Tariff C, Schedule 86 Service Lines, that I  
8 obtained from the records custodian at the Washington Utilities and Transportation  
9 Commission.

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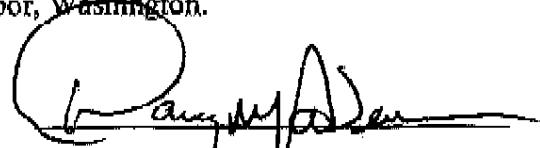
DECLARATION OF DOUG ANDERSON- 4

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**I declare under penalty of perjury under the laws of the State of Washington  
that the above declaration is true and correct:**

Executed March 8<sup>th</sup> at Oak Harbor, Washington.

  
Doug Anderson

DECLARATION OF DOUG ANDERSON- 5

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