

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION	
Complainant,	
v.	DOCKET UG-200994
NORTHWEST NATURAL GAS COMPANY,	DOCKET UG-200995
Respondent.	DOCKET UG-200996
	DOCKET UG-210085

**NORTHWEST NATURAL GAS COMPANY
Direct Testimony of Daniel B. Kizer
YEAR TWO DISTRIBUTION SYSTEM AND STORAGE FACILITY
CAPITAL PROJECTS
Exh. DBK-1T**

December 2, 2022

DIRECT TESTIMONY OF DANIEL B. KIZER

Table of Contents

	<u>Page</u>
I. Introduction and Summary	2
II. Year Two Distribution System and Storage Facility Capital Projects.....	4
A. White Salmon Reinforcement Project.....	4
B. SE 1 st Street Grading Project (Phase 2).....	8
C. Battle Ground Gate Station Rebuild Project.....	9
D. Ridgefield Gate Station Rebuild Project.....	11
E. Mist Well Rework Program 2021.....	13
F. Mist Corrosion Abatement Project (Phase 4).....	15
III. List of Exhibits.....	19

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
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I. INTRODUCTION AND SUMMARY

Q. Please state your name and position with Northwest Natural Gas Company (“NW Natural” or “the Company”).

A. My name is Daniel B. Kizer. I am the Engineering Senior Director for NW Natural. I am responsible for design, construction, operation, and maintenance of the gas transmission and distribution system and utility storage plants, and operations support services including work management functions, mapping and compliance.

Q. Please describe your education and employment background.

A. I graduated from Oregon State University with a Bachelor of Science in Civil Engineering, and I am a registered Professional Engineer in the State of Oregon.

Before being promoted to my current position at NW Natural in June 2021, I was an Engineering Manager for the Company beginning January 2018. Prior to holding that position, I was a Field Engineer for the Company beginning May 2012. Before joining NW Natural, I worked as a Project Manager at Westech Engineering, Inc. from 1993 until 2012.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to present evidence sufficient to demonstrate the prudence of the Year Two distribution system and storage facility capital projects listed in paragraph 10 of the Full Multi-Party Settlement Agreement (“Agreement”) (and its Attachment 1), filed with the Washington Utilities and Transportation Commission (“Commission”) on July 27, 2021, and approved by the Commission in Order 05 issued

1 in Dockets UG-200994, UG-200995, UG-200996 and UG-210085 on October 21,
2 2021.

3 **Q. What are the Year Two distribution system and storage facility capital projects in**
4 **the Agreement?**

5 A. The Year Two distribution system and storage facility capital projects in the Agreement
6 are:

- 7 • White Salmon Reinforcement Project
- 8 • SE 1st Street Grading Project (Phase 2)
- 9 • Battle Ground Gate Station Rebuild Project
- 10 • Ridgefield Gate Station Rebuild Project
- 11 • Mist Well Rework Program 2021
- 12 • Mist Corrosion Abatement Project (Phase 4)

13 **Q. Which of these capital projects went in-service prior to November 1, 2022, the rate**
14 **effective date for Year Two?**

15 A. All of these capital projects, except for the SE 1st Street Grading Project (Phase 2), went
16 in-service prior to November 1, 2022, and are used and useful. The SE 1st Street
17 Grading Project (Phase 2) expects to be in-service in 2023, for the reasons explained
18 later in my testimony.

19 **Q. For the capital projects that went in-service prior to November 1, 2022, what**
20 **evidence of their prudence are you providing in your testimony?**

21 A. In accordance with paragraph 14 of the Agreement, I am providing evidence regarding
22 any changes to the projects and related costs, including but not limited to:

- 23 a. The justification for the project, including supporting information;

- 1 b. Actual in-service dates;
- 2 c. Actual final costs, as well as explanations for significant cost variances;
- 3 d. Any changes to the projects themselves (for example, deviations from the
- 4 scope and descriptions provided in the Company’s initial filing in this case,
- 5 made on December 18, 2020 (“Initial Filing”));
- 6 e. Evidence that any cost overruns and the decision to continue to invest in the
- 7 project under any relevant changed circumstances was prudent; and
- 8 f. Updated information on offsetting factors presented in this case.

9 **II. YEAR TWO DISTRIBUTION SYSTEM AND STORAGE FACILITY**

10 **CAPITAL PROJECTS**

11 **A. White Salmon Reinforcement Project**

12 **Q. Please provide the justification for the White Salmon Reinforcement Project,**

13 **including supporting information.**

14 A. White Salmon, Washington had been fed by a single Class B three-inch steel pipeline

15 that was built in 1963, up East Jewett Boulevard. White Salmon has grown over the

16 years, and the pipeline was nearing capacity to meet future demand. Importantly, on

17 February 23, 2018, the Company observed a low pressure of 6 pounds per square inch

18 gauge (“psig”) at a telemetry site located on White Salmon’s Class B distribution

19 system. The 6 psig low pressure reading, which was recorded on a non-peak cold

20 weather event, is below the Company’s planning criteria of 10 psig to initiate a system

21 reinforcement improvement to avoid potential service disruptions during colder

22 weather conditions. Also, NW Natural’s modeling indicated that a significant portion

23 of the White Salmon distribution system would have experienced pressures less than

1 10 psig, and customer outages during simulated extreme cold weather could have
2 occurred, absent implementation of a remediating solution.

3 The Company implemented the White Salmon Reinforcement Project in order
4 to increase gas supply in White Salmon and stabilize system pressures during cold
5 weather events. NW Natural constructed a new approximately 8,000-foot segment of
6 Class B eight-inch polyethylene pipeline, using open trench methods, from our Class
7 B four-inch wrapped steel gas main on the south side of White Salmon and along
8 Humboldt Street, Ash Street, East Jewett Boulevard (Highway 141), Northwest Estes
9 Avenue and Northeast Tohomish Street to North Main Avenue, in order to reinforce its
10 preexisting pipeline into the White Salmon community. Exhibit DBK-2 are pictures of
11 the White Salmon Reinforcement Project.

12 **Q. What was the actual in-service date of the White Salmon Reinforcement Project?**

13 A. The actual in-service date of the White Salmon Reinforcement Project was September
14 30, 2021.

15 **Q. What was the actual final cost of the White Salmon Reinforcement Project,
16 compared with the Company's cost estimate provided in its Initial Filing?**

17 A. The actual final cost of the White Salmon Reinforcement Project was \$4.5 million at
18 the end of October 2022. I provided the actual final cost of the White Salmon
19 Reinforcement Project to Company witness Kyle T. Walker, who is presenting Direct
20 Testimony (Exh. KTW-10T) on the revenue requirement increase for Year Two. In its
21 Initial Filing, the Company's cost estimate for the White Salmon Reinforcement
22 Project was \$2.7 million.

1 **Q. Please explain the cost variance between the estimate provided in the Company's**
2 **Initial Filing and the actual final cost of the White Salmon Reinforcement Project.**

3 A. There are two reasons for the cost variance between the estimate provided in the
4 Company's Initial Filing and the actual final cost of the White Salmon Reinforcement
5 Project. First, after completing the design stage and then requesting bids in June 2021,
6 the Company received four bids in July 2021 that all were significantly higher than
7 planned, in large part due to the presence of rock in the trench excavation work zone
8 and the timing of the bidding of the work. Permitting delays for surveying and
9 potholing along East Jewett Boulevard delayed our planning phase work and caused us
10 to push the bidding phase back to early summer 2021, when prospective bidders
11 typically are not as aggressive when bidding work for that summer construction season.
12 Further, as noted on page 8 of the Direct Testimony of Joe S. Karney (Exh. JSK-1T),
13 two pipeline routes were being considered to bring gas from south White Salmon up
14 the hill to the city core near the North Main Avenue and East Jewett Boulevard
15 intersection. During the planning phase, more rock was discovered during potholing
16 along both of the proposed pipeline routes than was anticipated in the project's
17 preliminary cost estimate identified in the Company's Initial Filing. The East Jewett
18 Boulevard pipeline route ("Route 2") was selected as depth to rock was generally
19 deeper and rock was not expected to be encountered as much as the Dock Grade Road
20 pipeline route ("Route 1") described in Mr. Karney's Direct Testimony.

21 Second, in our response to data request UG-200994 PC DR 53 Attachment 1,
22 we noted the estimated project length was 7,800 feet. The final project length was
23 8,000 feet. City staff raised concerns about construction impacts to business access

1 along East Jewett Boulevard between Northwest Estes Avenue and North Main Avenue
2 near the top of the hill. To resolve City staff's concerns about the impact to businesses
3 during construction, the Company selected a longer route along Northwest Estes
4 Avenue and Northeast Tohomish Street to reach our tie-in connection on North Main
5 Avenue.

6 This explanation also describes the changes to the White Salmon
7 Reinforcement Project.

8 **Q. Despite the cost increase and changed circumstances, did the White Salmon**
9 **Reinforcement Project continue to be prudent?**

10 A. Yes. The Company had considered installation of a new gate station along the high-
11 pressure pipeline of The Williams Companies, Inc. ("Williams") on the north side of
12 the White Salmon community rather than the reinforcement project. Although it had a
13 similar estimated capital cost as the White Salmon Reinforcement Project at the time
14 of the Company's Initial Filing, the gate station would have been developed, built and
15 operated under the ownership of and control by Williams, and NW Natural would have
16 incurred an additional recurring expense to Williams for the ongoing maintenance of
17 the new gate station. Since the Company's Initial Filing, the Company gained visibility
18 to the actual costs from Williams of the Battle Ground and Ridgefield Gate Station
19 Rebuild Projects which were higher than the initial estimates provided by Williams.
20 Factoring in such expected higher actual capital costs and the additional annual
21 expense, the in-service White Salmon Reinforcement Project continues to be the least-
22 cost, least-risk option.

1 **Q. Are there any offsetting factors associated with the White Salmon Reinforcement**
2 **Project?**

3 A. No. The White Salmon Reinforcement Project did not result in any savings or
4 offsetting revenues.

5 **B. SE 1st Street Grading Project (Phase 2)**

6 **Q. Please describe the SE 1st Street Grading Project.**

7 A. The City of Vancouver has commenced a multi-phased “public works” roadway project
8 to improve the SE 1st Street corridor between SE 162nd Avenue and SE 192nd Avenue.
9 The SE 1st Street Grading Project is required to preemptively relocate the sections of
10 the Company’s main that are in conflict with the City’s project. During Phase 1
11 (completed in December 2020), between SE 162nd Avenue and SE 177th Avenue, the
12 Company relocated approximately 3,850 feet of Class D high pressure six-inch
13 wrapped steel gas main, 500 feet of Class B gas main and two services, abandoned
14 approximately 300 feet of Class B gas main, and removed a service regulator. During
15 Phase 2, between SE 177th Avenue and SE 192nd Avenue, the Company is planning to
16 relocate approximately 3,500 feet of Class D high pressure six-inch wrapped steel gas
17 main, install a new district regulator, install Class B six-inch polyethylene gas main
18 and reconnect several gas services. In its Initial Filing, the Company expected that
19 Phase 2 of the SE 1st Street Grading Project would be completed in October 2021 at a
20 cost estimate of \$2.3 million.

21 **Q. Was the SE 1st Street Grading Project (Phase 2) completed in October 2021 or at**
22 **any time before the November 1, 2022 rate effective date of Year Two?**

23 A. No.

1 **Q. Please describe the status of the SE 1st Street Grading Project (Phase 2).**

2 A. The City of Vancouver announced that it is delaying its multi-phased “public works”
3 roadway project until Spring 2023. NW Natural currently expects to commence
4 construction on the SE 1st Street Grading Project (Phase 2) in Summer 2023 and to have
5 it in-service in Fall 2023.

6 **Q. Is NW Natural seeking recovery of the SE 1st Street Grading Project (Phase 2) in
7 its Year Two filing?**

8 A. No. As detailed in Mr. Walker’s Direct Testimony (Exh. KTW-10T), all costs related
9 to this project have been removed from the Company’s request.

10 **C. Battle Ground Gate Station Rebuild Project**

11 **Q. Please provide the justification for the Battle Ground Gate Station Rebuild
12 Project, including supporting information.**

13 A. Due to growth in the Battle Ground area, obsolescence of equipment at the gate station
14 site and flow regularly exceeding the upstream pipeline’s equipment design, this station
15 required an increase in capacity to accommodate customer load requirements. The
16 project included replacement of metering, regulation, controls, and installation of a line
17 heater. Williams, the upstream pipeline owner, also required transfer of regulation and
18 overpressure protection to NW Natural as part of this project, which necessitated
19 changes to upstream pipeline components to accommodate that transfer. Exhibit DBK-
20 3 are pictures of the Battle Ground Gate Station Rebuild Project.

1 **Q. What was the actual in-service date of the Battle Ground Gate Station Rebuild**
2 **Project?**

3 A. The actual in-service date of the Battle Ground Gate Station Rebuild Project was
4 September 16, 2021.

5 **Q. What was the actual final cost of the Battle Ground Gate Station Rebuild Project,**
6 **compared with the Company's cost estimate provided in its Initial Filing?**

7 A. The actual final cost of the Battle Ground Gate Station Rebuild Project was \$3.0 million
8 at the end of October 2022. I provided the actual final cost of the Battle Ground Gate
9 Station Rebuild Project to Mr. Walker, who is presenting Direct Testimony (Exh.
10 KTW-10T) on the revenue requirement increase for Year Two. In its Initial Filing, the
11 Company's cost estimate for the Battle Ground Gate Station Rebuild Project was \$1.4
12 million.

13 **Q. Please explain the cost variance between the estimate provided in the Company's**
14 **Initial Filing and the actual final cost of the Battle Ground Gate Station Rebuild**
15 **Project.**

16 A. At the time of the Company's Initial Filing, the Battle Ground Gate Station Rebuild
17 Project was in the preliminary design phase and we had not started the assessment
18 phase or planning phase work upon which a detailed cost estimate could be developed,
19 so the Company instead used a general estimate based on similar projects of scope and
20 size. Williams later determined that it needed to install a new pipeline tap, required to
21 be paid by the Company. Additionally, NW Natural has experienced the actual cost of
22 Williams' projects, including the Battle Ground Gate Station Rebuild Project, to be

1 higher than estimated capital costs initially provided by Williams. This explanation
2 also describes the change to the Battle Ground Gate Station Rebuild Project.

3 **Q. Despite the cost increase and changed circumstances, did the Battle Ground Gate**
4 **Station Rebuild Project continue to be prudent?**

5 A. Yes. The Company determined that there were no alternatives to the Battle Ground
6 Gate Station Rebuild Project because the gate station is a single feed to the community
7 it serves, and the station was undersized to serve the increased customer load growth.
8 Consequently, the in-service Battle Ground Gate Station Rebuild Project continues to
9 be the least-cost, least-risk option.

10 **Q. Are there any offsetting factors associated with the Battle Ground Gate Station**
11 **Rebuild Project?**

12 A. No. The Battle Ground Gate Station Rebuild Project did not result in any savings or
13 offsetting revenues.

14 **D. Ridgefield Gate Station Rebuild Project**

15 **Q. Please provide the justification for the Ridgefield Gate Station Rebuild Project,**
16 **including supporting information.**

17 A. Due to growth in the Ridgefield area, obsolescence of equipment at the gate station site
18 and flow regularly exceeding the upstream pipeline's equipment design, this station
19 required an increase in capacity to accommodate customer load requirements. The
20 project included replacement of metering, regulation, controls, installation of a line
21 heater, and stormwater retention facilities and related land acquisition by Williams, the
22 upstream pipeline owner. Williams also required transfer of regulation and
23 overpressure protection to NW Natural as part of this project, which necessitated

1 changes to upstream pipeline components to accommodate that transfer. Exhibit DBK-
2 4 are pictures of the Ridgefield Gate Station Rebuild Project.

3 **Q. What was the actual in-service date of the Ridgefield Gate Station Rebuild**
4 **Project?**

5 A. The actual in-service date of the Ridgefield Gate Station Rebuild Project was
6 September 15, 2021.

7 **Q. What was the actual final cost of the Ridgefield Gate Station Rebuild Project,**
8 **compared with the Company's cost estimate provided in its Initial Filing?**

9 A. The actual final cost of the Ridgefield Gate Station Rebuild Project was \$3.1 million at
10 the end of October 2022. I provided the actual final cost of the Ridgefield Gate Station
11 Rebuild Project to Mr. Walker, who is presenting Direct Testimony (Exh. KTW-10T)
12 on the revenue requirement increase for Year Two. In its Initial Filing, the Company's
13 cost estimate for the Ridgefield Gate Station Rebuild Project was \$1.7 million.

14 **Q. Please explain the cost variance between the estimate provided in the Company's**
15 **Initial Filing and the actual final cost of the Ridgefield Gate Station Rebuild**
16 **Project.**

17 A. At the time of the Company's Initial Filing, the Ridgefield Gate Station Rebuild Project
18 was in the preliminary design phase and we had not started the assessment phase or
19 planning phase work upon which a detailed cost estimate could be developed, so the
20 Company instead used a general estimate based on similar projects of scope and size.
21 Williams later determined that it needed to install a new pipeline tap, required to be
22 paid by the Company. The City of LaCenter also subsequently required Williams to
23 install stormwater retention facilities, which triggered Williams having to acquire

1 additional land, all required to be paid by the Company. Additionally, NW Natural has
2 experienced the actual cost of Williams' projects, including the Ridgefield Gate Station
3 Rebuild Project, to be higher than estimated capital costs initially provided by
4 Williams. This explanation also describes the changes to the Ridgefield Gate Station
5 Rebuild Project.

6 **Q. Despite the cost increase and changed circumstances, did the Ridgefield Gate**
7 **Station Rebuild Project continue to be prudent?**

8 A. Yes. The Company determined that there were no alternatives to the Ridgefield Gate
9 Station Rebuild Project because the gate station is a single feed to the community it
10 serves, and the station was undersized to serve the increased customer load growth.
11 Consequently, the in-service Ridgefield Gate Station Rebuild Project continues to be
12 the least-cost, least-risk option.

13 **Q. Are there any offsetting factors associated with the Ridgefield Gate Station**
14 **Rebuild Project?**

15 A. No. The Ridgefield Gate Station Rebuild Project did not result in any savings or
16 offsetting revenues.

17 **E. Mist Well Rework Program 2021**

18 **Q. Please provide the justification for the Mist Well Rework Program for 2021,**
19 **including supporting information.**

20 A. In December 2016, U.S. Department of Transportation Pipeline and Hazardous
21 Materials Safety Administration ("PHMSA") adopted new safety regulations
22 specifically for underground gas storage facilities. In compliance with those
23 regulations, NW Natural completed the development of its Well Integrity Plan and

1 accelerated the development of a Risk Management Plan for the underground storage
2 fields at Mist that included a schedule to rework the storage wells over the federally
3 mandated eight-year guideline. The Mist Well Rework Program for 2021 involved the
4 rehabilitation of five underground storage wells within the Mist storage fields and
5 ensured their functional integrity complies with the Company's Risk Management Plan
6 and PHMSA requirements. Exhibit DBK-5 are before and after pictures of the Mist
7 Well Rework Program for 2021.

8 **Q. What was the actual in-service date of the Mist Well Rework Program for 2021?**

9 A. The actual in-service date of the Mist Well Rework Program for 2021 was September
10 27, 2021.

11 **Q. What was the actual final cost of the Mist Well Rework Program for 2021,
12 compared with the Company's cost estimate provided in its Initial Filing?**

13 A. The actual final cost of the Mist Well Rework Program for 2021 was \$2.2 million at
14 the end of October 2022, or approximately \$240 thousand on a Washington-allocated
15 basis. I provided the actual final cost of the Mist Well Rework Program for 2021 to
16 Mr. Walker, who is presenting Direct Testimony (Exh. KTW-10T) on the revenue
17 requirement increase for Year Two. In its Initial Filing, the Company's cost estimate
18 for the Mist Well Rework Program for 2021 was \$3.3 million, or approximately \$362
19 thousand on a Washington-allocated basis.

20 **Q. Please explain the cost variance between the estimate provided in the Company's
21 Initial Filing and the actual final cost of the Mist Well Rework Program for 2021.**

22 A. During the course of the development of the Mist Well Rework Program for 2022, the
23 Company determined that the preliminary cost estimate provided in the Initial Filing

1 for the Mist Well Rework Program for 2021 inadvertently also included the cost for
2 rehabilitating a non-utility well. The final project cost only includes work on wells that
3 support our core utility customers.

4 **Q. Whether considered before or after reflecting this cost decrease and changed**
5 **circumstances, did the Mist Well Rework Program for 2021 continue to be**
6 **prudent?**

7 A. Yes. The investment was necessary for regulatory compliance, and there were no
8 alternatives to performing the assessment and remediation.

9 **Q. Are there any offsetting factors associated with the Mist Well Rework Program**
10 **for 2021?**

11 A. No. The Mist Well Rework Program for 2021 did not result in any savings or offsetting
12 revenues.

13 **F. Mist Corrosion Abatement Project (Phase 4)**

14 **Q. Please provide the justification for the Mist Corrosion Abatement Project (Phase**
15 **4), including supporting information.**

16 A. In June 2016, the Company completed an engineering facility assessment of the Mist
17 Storage Facility (“Mist Storage Facility Assessment”) and identified a number of
18 needed improvements to the facility to improve site reliability, resulting in the Mist
19 Reliability Program. Without many of the suggested upgrades, Miller Station and the
20 Mist storage operation would likely experience equipment failures, increased
21 operations and maintenance costs, cyber threats, and other risks over the next 25 years.

22 One of the identified improvements was the development and implementation
23 of an internal and external corrosion monitoring program, because there was no internal

1 corrosion monitoring data at that time and there was a strong potential for internal and
2 external corrosion within the Mist gathering systems. The Mist Corrosion Abatement
3 Project is a key component of the Mist Reliability Program and provides data and
4 trending for NW Natural to better evaluate the conditions in the field and respond
5 appropriately. In Phase 4, the Company utilized In-Line Inspection (“ILI”) tools to
6 evaluate the existing conditions and validate the integrity of specific pipelines of the
7 Mist gathering systems. As part of Phase 4, the Company also modified certain
8 pipelines to accommodate the insertion, transmission and extraction of the ILI tools.
9 Exhibit DBK-6 are pictures of the Mist Corrosion Abatement Project (Phase 4).

10 **Q. What was the actual in-service date of the Mist Corrosion Abatement Project**
11 **(Phase 4)?**

12 A. The actual in-service date of the Mist Corrosion Abatement Project (Phase 4) was June
13 30, 2022.

14 **Q. What was the actual final cost of the Mist Corrosion Abatement Project (Phase**
15 **4), compared with the Company’s cost estimate provided in its Initial Filing?**

16 A. The actual final cost of the Mist Corrosion Abatement Project (Phase 4) was \$3.4
17 million at the end of October 2022, or approximately \$366 thousand on a Washington-
18 allocated basis. I provided the actual final cost of the Mist Corrosion Abatement
19 Project (Phase 4) to Mr. Walker, who is presenting Direct Testimony (Exh. KTW-10T)
20 on the revenue requirement increase for Year Two. In its Initial Filing, the Company’s
21 cost estimate for the Mist Corrosion Abatement Project (Phase 4) was \$3.2 million, or
22 approximately \$344 thousand on a Washington-allocated basis.

1 **Q. Were there any changes to the Mist Corrosion Abatement Project (Phase 4) from**
2 **its description in the Initial Filing?**

3 A. The work to perform the ILI for the Mist Corrosion Abatement Project (Phase 4) was
4 delayed approximately three months as a result of a well being shut down to replace a
5 damaged well casing discovered during the Mist Well Rework Program for 2021,
6 which limited the Company's ability to perform an ILI of the gathering/collection line
7 that serves part of one of the storage fields. This delay did not cause any change in
8 scope for the project or have a material impact to the cost of the Mist Corrosion
9 Abatement Project (Phase 4). .

10 **Q. Did the Mist Corrosion Abatement Project (Phase 4) continue to be prudent and**
11 **the least-cost, least-risk alternative?**

12 A. Yes. ILIs assess an entire pipeline segment, between the pig launcher and pig receiver,
13 and can identify dents or other defects where the coating may not have been disturbed,
14 as well as internal defects such as corrosion and bad pipe seams. When we withdraw
15 gas from the storage wells, small amounts of water are pulled into the pipelines that
16 carry gas between the wells and Miller Station. Performing the ILI allows us to inspect
17 for any internal pipe corrosion. The only alternative would have been to not perform
18 the pipeline modifications and ILI assessments. The investment was necessary to
19 assess the risk and repair any anomalies prior to failure. Not performing the inspections
20 would have left a higher risk of pipeline failure.

1 **Q. Are there any offsetting factors associated with the Mist Corrosion Abatement**
2 **Project (Phase 4)?**

3 A. No. The Mist Corrosion Abatement Project (Phase 4) did not result in any savings or
4 offsetting revenues.

5 **Q. Does this conclude your Direct Testimony?**

6 A. Yes.

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III. LIST OF EXHIBITS

- Exh. DBK-2.....Pictures of the White Salmon Reinforcement Project
- Exh. DBK-3Pictures of the Battle Ground Gate Station Rebuild Project
- Exh. DBK-4.....Pictures of the Ridgefield Gate Station Rebuild Project
- Exh. DBK-5.....Pictures of the Mist Well Rework Program for 2021
- Exh. DBK-6.....Pictures of the Mist Corrosion Abatement Project (Phase 4)