

EXHIBIT "B"

INFORMATION REQUIRED BY WAC 480-93-020

1. **The petitioning gas company shall certify that it is not practical to select an alternative route which will avoid such locations:** Ferndale Pipeline is an operating facility. Hence, information concerning alternative routes may not be relevant because it appears tantamount to an inquiry about abandonment of the pipeline. As explained in the petition and supporting documentation, the requested MOP uprate is well within the design capability of Ferndale Pipeline. In petitioner's view, abandonment would be totally unjustified.
2. Prior to filing this petition, however, BP did consider two alternatives to the requested increase in MOP. Each alternative would require new construction and/or new compressor stations. After investigation, each alternative was concluded to be less attractive than the increase in MOP requested in this petition.
3. First, BP was contacted about the possibility of becoming a shipper on the proposed GSX Pipeline. If necessary authorizations were to be received, the Williams Companies would construct this new pipeline on a route roughly paralleling Ferndale Pipeline from Sumas to the refinery, and from the refinery across the Straits of Georgia to Vancouver Island. BP has no information with which to predict whether the GSX Pipeline will be constructed. Even if authorization were to be received, it does not appear that the GSX construction could accommodate completion of the Cherry Point Cogeneration Project by 2006.
4. Second, BP approached Cascade Natural Gas Corporation about utilizing unused capacity on Cascade pipeline facilities near the Cherry Point refinery. BP was informed that a new compressor station would be required along the Cascade line,

which was not designed to the exacting specifications incorporated into Ferndale Pipeline. BP also found this alternative to be inferior to the requested increase in Ferndale Pipeline MOP.

5. **The petitioning gas company shall further certify that management has given due consideration to the possibility of the future development of the area and has designed its facilities accordingly:** BP does not expect any significant development along the Ferndale Pipeline right-of-way. During the 13 years of pipeline operations, the route has remained overwhelmingly agricultural and wooded. There are very few dwellings within 500 feet of the right-of-way. With the exception of I-5, the public highways under which the pipeline passes are rural, 2-lane roads.
6. If development nevertheless occurs, BP has already done all that is reasonably feasible to accommodate it. Ferndale Pipeline was designed to operate within an urbanized Class 4 location.