

EXHIBIT NO. _____ (EMM-34)
DOCKET NO. _____
2003 POWER COST ONLY RATE CASE
WITNESS: ERIC M. MARKELL

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

Docket No. _____

v.

PUGET SOUND ENERGY, INC.,

Respondent.

DIRECT TESTIMONY OF
ERIC M. MARKELL
ON BEHALF OF PUGET SOUND ENERGY, INC.

Ranking of EPCOR Fossil Fired Plants by the Canadian Electricity Association (CEA).

Rankings were obtained from the three most recently available CEA Generation Equipment Status Annual reports, 1999, 2000 and 2001. The 2002 report is not available at this time. The CEA ranks only the top ten fossil units operating a minimum of 4000 hours in the year and ranking is based on Incapability Factor (ICbF) and Operating Factor.

1999

<i>By ICbF</i>	<i>Unit</i>	<i>ICbF %</i>
1	Genesee 2	1.16
2	Rossdale 9	1.98
3	Rossdale 8	2.11

<i>By Operating Factor</i>	<i>Unit</i>	<i>Operating Factor %</i>
1	Genesee 2	98.99

2000

<i>By ICbF</i>	<i>Unit</i>	<i>ICbF %</i>
1	Clover Bar 3	1.23
2	Clover Bar 1	1.89
3	Clover Bar 2	2.18
4	Clover Bar 4	3.73
6	Genesee 1	4.75
9	Rossdale 9	6.00

<i>By Operating Factor</i>	<i>Unit</i>	<i>Operating Factor %</i>
1	Clover Bar 3	99.17
2	Clover Bar 2	99.05
3	Clover Bar 1	98.51
4	Clover Bar 4	96.32
7	Genesee 1	95.37

2001

<i>By ICbF</i>	<i>Unit</i>	<i>ICbF %</i>
1	Clover Bar 4	0.68
2	Genesee 1	0.87

<i>By Operating Factor</i>	<i>Unit</i>	<i>Operating Factor %</i>
1	Genesee 1	99.18

Safety

Annually, the President's Award of Excellence for Employee Safety is presented to members who have demonstrated superior safety performance in the past year. By promoting safety, this award has assisted CEA members in meeting their objectives of accident reduction and overall performance.

To receive the President's Award, a reporting utility must be ranked within the top quartile of their grouping for both All Injury Frequency and Severity rates. There are three award levels: Bronze for the companies who meet the award criteria for the given year; Silver for meeting the criteria two consecutive years; and Gold for three or more consecutive years.

Information on these awards is available in the form of an annual news release on the CEA website for the years 1999 – 2002. During this period EPCOR was awarded the Bronze Award in 2001.