

**EXH. JPH-3  
DOCKETS UE-240004/UG-240005  
2024 PSE GENERAL RATE CASE  
WITNESS: JAMES P. HOGAN**

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PUGET SOUND ENERGY,**

**Respondent.**

**Docket UE-240004  
Docket UG-240005**

**SECOND EXHIBIT (NONCONFIDENTIAL) TO THE  
PREFILED DIRECT TESTIMONY OF**

**JAMES P. HOGAN**

**ON BEHALF OF PUGET SOUND ENERGY**

**FEBRUARY 15, 2024**

**FEDERAL ENERGY REGULATORY COMMISSION**

**Office of Energy Projects**

**Division of Dam Safety and Inspections – Headquarters Office**

**888 First Street, N.E., Routing Code: PJ-13**

**Washington, D.C. 20426**

**(202) 502-6025 Office -- (202) 219-2731 Facsimile**

**FEB 12 2013**

In reply refer to:  
P-2150-WA  
NATDAM Nos.: WA00172,  
WA00173

Mr. Paul K. Wetherbee  
Director, Hydroelectric Resources  
Puget Sound Energy, Inc.  
P.O. Box 97034, PSE-09N  
Bellevue, Washington 98009-9734

Re: Board of Consultants for the Baker River Project

Dear Mr. Wetherbee:

As discussed with Ms. Lynn Thompson on Tuesday, January 22, 2012, this letter is to inform you that an independent Board of Consultants (Board) is required to fully evaluate the potential failure modes (PFMs) related to rock abutment stability adequacy for Upper and Lower Baker Dams of the Baker River Project, FERC No. 2150. These PFMs are currently being addressed by Puget Sound Energy's (PSE's) dam safety investigations of the rock abutment stability of both dams in the Lower Baker Leakage Investigation and the Upper Baker Gallery Project.

The Board shall be comprised of at least three members with expertise in the following fields: rock mechanics, geological engineering or geology, and structural engineering. Also, the Board members shall have expertise in PFMs related to rock abutment wedge failures under dams and abutment leakage.

By letter, a copy of each proposed Board member's resume is to be submitted to the Director, Division of Dam Safety and Inspections (D2SI) for review and approval, and two copies submitted to the D2SI- Portland Regional Engineer.

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The Board shall assess, as a minimum, the areas listed below:

1) Lower Baker Rock Abutment investigations including:

- a. Previous Lower Baker Rock Abutment and Leakage Investigation reports.
- b. Proposed Lower Baker rock abutment exploration program.
- c. Any credible rock abutment wedges under Lower Baker Dam which could cause failure of the dam.
- d. Any other PFMs related to a potential dam failure caused by rock abutment issues (i.e. related to abutment leakage).
- e. The surveillance and monitoring required for any credible PFMs.
- f. Any dam safety issues associated with grouting to address leakage issues at the dam.

2) Upper Baker Gallery Project, specifically the movement of Blocks 18 and 19, including:

- a. Previous Upper Baker Rock Abutment studies as they relate to Blocks 18 and 19.
- b. Whether or not the rotation on the plane oriented approximately parallel to the right valley slope as described in the attachment is a reasonable explanation of the cracking observed at the Block 18/19 upstream contact.
- c. Any additional mechanism or loading condition that would allow additional differential movement between Blocks 18 and 19.
- d. Dam safety consequences related to additional movement (i.e. could sufficient movement cause an uncontrolled release of the reservoir?).
- e. The adequacy of the currently proposed monitoring plan.

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**The operation of the Board should be as follows:**

- 1) There will be formal meetings of the Board scheduled for the project to review the technical areas the Board is required to assess. The meetings should be scheduled at important milestones for the investigations, and any design of remediation or planned surveillance and monitoring improvements. It is anticipated that the meetings will be attended by members of the Board, PSE staff and engineering consultants, and the FERC.**
- 2) At least two weeks prior to each project Board meeting, PSE shall provide to the distribution list below a data package that contains:**
  - a. A meeting agenda;**
  - b. A statement of the scope and specific level of review the Board is expected to provide;**
  - c. A list of the items to be reviewed and discussed with the Board;**
  - d. Investigations, engineering analyses reports, design drawings and specifications to be reviewed by the Board; and**
  - e. A discussion of significant events in the investigation or design that have occurred since the last Board meeting.**

**The data package, as well as all project related correspondence, should be distributed as follows:**

- f. One copy to each Board member;**
  - g. Three copies to the Director, D2SI, Washington, DC; and**
  - h. Three copies to the D2SI-Portland Regional Engineer.**
- 3) At the conclusion of each Board meeting, the Board shall verbally present their conclusions and recommendations and provide PSE with a copy of the Board meeting report. An electronic copy of the report should also be included.**
  - 4) Within 15 days after each Board meeting, PSE shall submit three copies of the plan and schedule to comply with the Board's recommendations to the Director, D2SI, and three copies to the D2SI-Portland Regional Engineer. In the event some of the Board's recommendations are not implemented,**

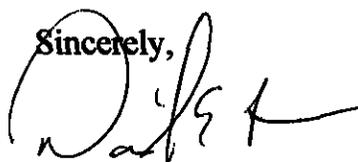
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reasons for not doing so should be provided. We may require additional action after we review the above information.

- 5) A summary of all the Board's recommendations is to be maintained in a status report folder. Each recommendation shall be referenced to indicate the Board report in which the recommendation was made, and include the current status and outcome of the recommendation.
- 6) One year after completion of any project construction required, a final Board meeting is to be held. Within 45 days of the date of the final Board meeting, three copies of the final Board meeting report are to be submitted to the Director, D2SI, and three copies to the D2SI-Portland Regional Engineer. The final report shall contain a statement indicating the Board's opinion with respect to the investigations, analyses, designs, PFMs identified, risk reduction measures, and construction activities, if needed. If no construction is required, a final report is to be submitted within three months after the final Board meeting.

You should submit your proposed Board members for approval within 14 days from the date of this letter. Thank you for your attention to these important matters. If you have any questions regarding this letter, please call me at 202-502-6025.

Sincerely,



for William H. Allerton, P.E.  
Director  
Division of Dam Safety and Inspections

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