



Puget Sound Energy, Inc.
P.O. Box 97034
Bellevue, WA 98009-9734

March 7, 2007

**VIA FACSIMILE; HARD COPY
TO FOLLOW VIA U.S. MAIL**

Facsimile No.: (202) 208-0056

Kathryn Allen
Attorney-Advisor
General & Administrative Law
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

**Re: City of Burlington's Critical Energy Infrastructure Information Request;
Docket Nos. CE07-68-000 through CE07-69-000**

Dear Ms. Allen:

Puget Sound Energy, Inc. ("PSE"), the licensee of the Baker River Hydroelectric Project, FERC No. 2150 ("Project"), responds to your letter requesting our comments on the request of the City of Burlington, Washington (the "City") for critical energy infrastructure information ("CEII") related to the Project. Mr. Chal A. Martin and Mr. Michael Harmon submitted these requests on behalf of the City. Mr. Martin requested this same information approximately one year ago. Mr. Martin was then acting as the Director of the Skagit County Public Works Department. PSE's response to Mr. Martin's prior request (CE06-22-000 through CE06-25-000) is attached to this letter for your further reference and information. For the reasons previously noted and as summarized below, PSE respectfully requests that the Federal Energy Regulatory Commission ("FERC") deny the City's requests as to most of these documents in order to achieve the purposes of the Commission's CEII regulations.

A. Protection of CEII Documents

The existing Project facilities constitute critical energy infrastructure. The incapacity or destruction of the Project would negatively affect security, economic security, and public health or safety. *See* 18 C.F.R. § 388.113(c)(2). Project information related to dam safety found in the documents requested by the City is CEII, defined by the Commission as information about proposed or existing critical infrastructure that: "(i) relates to the production, generation, transportation, or distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure; (iii) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and (iv) does not simply give the location of the critical infrastructure." 18 C.F.R. § 388.113(c)(1).

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PW - Engineering

PSE's concern with disclosing this type of information to the City is not to suggest or imply that the City intends to facilitate use of these documents for improper purposes. However, as we advised FERC in connection with the prior request for this information, PSE is concerned that making these documents available to the City would also make them available to the general public by application of the public disclosure laws of the State of Washington (*see, generally*, Washington Public Records Act, Chapter 42.56 RCW).

B. Accession No. 20050912-0365 ("Document 1")

Document 1 includes base summaries of studies undertaken to attempt to assess Probable Maximum Precipitation ("PMP") and Probable Maximum Flood ("PMF"). Specifically, Document 1 includes the Part 12 PMP/PMF Study Technical Memos 1 through 5 for an ongoing Part 12 study related to the Project. These memos were prepared using data that are now outdated and irrelevant to the current Part 12 review. The methodology employed in these studies to simulate PMP and PMF was rejected and the modeling standards described in these memoranda are not applicable to the Project. For these reasons, it is possible that this information is no longer considered CEII. However, pages 6 through 11 of Technical Memorandum No. 2 provide depictions of Project infrastructure details that could be used to extract information regarding Project operations, and includes depictions of Project features in areas not publicly accessible that under a worst case scenario could be useful to a terrorist. If you determine that these documents may be disclosed, pages 6 through 11 containing CEII should be redacted.

C. Accession No. 20050825-0060, and 20050722-0315 ("Documents 2 and 3")

PSE neither prepared nor transmitted these documents to FERC. These documents were filed by the Commission's Portland Regional Office. As such, we are not in a position to assess the appropriateness of FERC's designation of these documents. However, based upon our review of the document descriptions, these documents do appear to include dam safety reports and technical data from which a person could assess likely methods of inflicting the greatest damage to Project infrastructure. Hence, these documents are also likely to contain CEII information.

D. Accession No. 20050609-0034 ("Document 4")

Document 4, the Board of Consultant's Report from the first Board Meeting held May 6, 2005, describes the Board of Consultant's review of the technical memoranda contained in Document 1. Based on our review, PSE believes that this document is no longer considered CEII and may be disclosed. The information contained in this document is outdated and irrelevant to the current Part 12 review.

E. Accession No. 20041115-4054, 20041115-4052, 20041115-4046 and 20041115-4041 ("Documents 5, 6, 7 and 8")

Documents 5 through 8 are draft reports related to the FERC Part 12 Safety Inspection for the Project. These documents include the "Potential Failure Modes Analysis" ("PFMA") and supporting technical information.

The information in these documents meets all elements of the Commission's CEII test and should not be disclosed. The CEII information in these documents does not merely disclose the location of the infrastructure. Rather, the documents relate primarily to the Project's production, generation, and transportation of energy and the potential failure mode analysis. This information could be useful to a person planning an attack on Project infrastructure. Documents 5 through 8, as indicated in their titles, contain potential failure modes analyses that could serve as a roadmap for someone who seeks to identify Project weaknesses and the means of destroying a Project.

These documents also qualify for exemption under the Freedom of Information Act, 5 U.S.C. § 552 et seq. ("FOIA"). These documents were compiled for the purposes of the Commission's enforcement of the Federal Power Act for the comprehensive development and operation of hydropower projects and used to develop protocols to protect and alert threatened communities in coordination with state and local law enforcement agencies. These records constitute law enforcement documents under FOIA's Exemption 7, where release of the information "could reasonably be expected to endanger the life or physical safety of any individual." 5 U.S.C. § 552(b)(7)(F).

F. The City Cannot Prevent Documents from Further Disclosure Under Washington Public Disclosure Laws

As noted above, once the documents in question are in the City's hands, they are in the public domain. We must therefore look at these requests from the City as if they were requests from any member of the general public. Nor can this information be protected by a non-disclosure agreement. The Washington Public Records Act, Chapter 42.56 RCW ("PRA") provides that "[e]ach agency . . . shall make available for public inspection and copying all public records" unless the record falls within certain specific exemptions of the Act. RCW 42.56.070(1). A "public record" includes "any writing containing information relating to the conduct of government[.]" RCW 42.17.020(41). The City's request states that the need for the documents is because the City "is in the flood plain down stream of the Baker Project, P-2150." PSE is concerned that, if these documents are provided to the City, they will be considered in the public domain as a public record and become available to anyone who may request them from the City. Therefore, a non-disclosure agreement would not provide the desired protection for CEII documents. FERC cannot rely upon the City's ability to protect such information given the PRA requirements. Where, as here, a disclosure agreement would be ineffective even if executed by the requester, FERC should deny the CEII request.

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G. Other Documents

Please note that your letter did not include a copy of the underlying request so we are unable to verify the full scope of the request. Thus, in an effort to timely respond to your letter, we presume that the only CEII information that you would potentially provide in response to the request is that which is identified in your letter.

H. Conclusion

The documents requested are of such a sensitive nature that disclosure to the City—which, due to the operation of Washington State's public disclosure law equates to a release to the public at-large—poses an unreasonable risk to public safety and Project security. Moreover, the conclusions of ongoing dam safety assessments may ultimately be available to the City in an appropriate format that does not present such risks when the ongoing Part 12 study and reports are completed. Except as noted above, the City's request should be denied.

Very truly yours,

PUGET SOUND ENERGY, INC.


Kendall J. Cammermeyer
Corporate Counsel

KJM:mdb

Encl.

cc: Irena Netik
Chal A. Martin, P.E.
Michael Harmon, P.E.

*** TX REPORT ***

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SENDER:	TELEPHONE:	FACSIMILE:
Kendall Cammermeyer, Corporate Counsel Puget Sound Energy, Inc.	(425) 462-3372	(425) 456-2707

RECIPIENT:	COMPANY:	TELEPHONE:	FACSIMILE:
Lawrence D. Crocker, III Attn: Ann Gorton, Esq.	Associate General Counsel, FERC	(202) 502-8591 - (Ann Gorton, Esq.)	(202) 208-0056

RE: *Puget Sound Energy, Inc.'s Response to Skagit County CEII Request*
Docket Nos. CE06-22-000 through CE06-25-000

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<i>Kendall Cammermeyer, Corporate Counsel Puget Sound Energy, Inc.</i>	<i>(425) 462-3372</i>	<i>(425) 456-2707</i>

RECIPIENT:	COMPANY:	TELEPHONE:	FACSIMILE:
<i>Lawrence D. Crocker, III Attn: Ann Gorton, Esq.</i>	<i>Associate General Counsel, FERC</i>	<i>(202) 502-8591 – (Ann Gorton, Esq.)</i>	<i>(202) 208-0056</i>

RE: *Puget Sound Energy, Inc.'s Response to Skagit County CEII Request
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PUGET SOUND ENERGY

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Lawrence D. Crocker, III
Associate General Counsel
Attn: Ann Gorton, Esq.
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: Puget Sound Energy, Inc.'s Response to Skagit County Department of Public Works' Critical Energy Infrastructure Information Request
Docket Nos. CE06-22-000 through CE06-25-000

Dear Mr. Crocker:

Puget Sound Energy, Inc. ("PSE"), the licensee of the Baker River Hydroelectric Project, FERC No. 2150 ("Project"), responds to your January 25, 2006 letter requesting our comments on four requests on behalf of the Skagit County Department of Public Works (the "County") for critical energy infrastructure information ("CEII") related to the Project. The County's requests for disclosure include 22 CEII and non-public documents (the "Request List"). We reviewed the County's request forms and data related to the documents listed, and assessed the nature of the information contained in these documents. PSE is concerned that making these documents available to the County will also make them available to the general public, by application of the public disclosure laws of the State of Washington. We do not mean to suggest or imply that the County intends to facilitate improper use of the documents, however, once the documents are in the County's hands, they are in the public domain. We must therefore look at these requests from the County as if they were requests from any member of the general public. Therefore, PSE respectfully requests that the Federal Energy Regulatory Commission ("FERC") deny the County's requests as to most of these documents in order to achieve the purposes of the Commission's CEII regulations.

1. Protection of CEII Documents (Documents 1, 3, 4, 6, 18-22)

The existing Project facilities constitute critical energy infrastructure. The incapacity or destruction of the Project would negatively affect security, economic security, and public health or safety. *See* 18 C.F.R. § 388.113(c)(2). Project information related to dam safety found in Documents 1, 3, 4, 6 and 18-22 is CEII, defined by the Commission as information about proposed or existing critical infrastructure that: "(i) relates to the production, generation, transportation, or distribution of energy; (ii) could be useful to a person in planning an attack on

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critical infrastructure; (iii) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and (iv) does not simply give the location of the critical infrastructure." 18 C.F.R. § 388.113(c)(1).

Documents 1 and 6.

Document 1 includes base summaries of studies undertaken to attempt to assess Probable Maximum Precipitation ("PMP") and Probable Maximum Flood ("PMF"). Specifically, Document 1 includes the Part 12 PMP/PMF Study Technical Memos 1 through 5 for an ongoing Part 12 study related to the Project. These memos were prepared using data that are now outdated and irrelevant to the current Part 12 review. The methodology employed in these studies to simulate PMP and PMF was rejected and the modeling standards described in these memoranda are not applicable to the Project. For these reasons, it is possible that this information is no longer considered CEII. However, pages six through eleven of Technical Memorandum No. 2 provide depictions of Project infrastructure details that could be used to extract information regarding Project operations, and includes depictions of Project features in areas not publicly accessible that under a worst case scenario could be useful to a terrorist. If you determine that these documents may be disclosed, pages 6 through 11 containing CEII should be redacted.

Document 6, the Board of Consultant's Report from the first Board Meeting held May 6, 2005, describes the Board of Consultant's review of the technical memoranda contained in Document 1. Based on our review, PSE believes that this document is no longer considered CEII and may be disclosed for the same reasons that apply to Document 1.

Documents 3 and 4.

PSE reviewed the Request List and compared the descriptions and filing date information against the information provided in the Commission's eLibrary database. PSE recreated the list, attached to this letter as Exhibit A, based upon the eLibrary data for each Request List document. Documents 3 and 4 were issued by FERC, as indicated by the "submittal" categorization per the eLibrary database. *See* Exhibit A.

PSE neither prepared nor transmitted these documents. These documents were filed by the Commission's Portland Regional Office ("PRO"). As such, we are not in a position to assess the appropriateness of FERC's designation of these documents. However, based upon our review of the document descriptions, these documents do appear to include dam safety reports and technical data from which a person could assess likely methods of inflicting the greatest damage to Project infrastructure. Hence, these documents are also likely to contain CEII information.

Documents 18-22.

Documents 18-22 are draft reports related to the FERC Part 12 Safety Inspection for the Project. These documents include the "Potential Failure Modes Analysis" ("PFMA") and supporting technical information ("STI").¹

The information in these documents meets all elements of the Commission's CEII test and should not be disclosed. The CEII information in these documents does not merely disclose the location of the infrastructure. Rather, the documents relate primarily to the Project's production, generation, and transportation of energy and the potential failure mode analysis. This information could be useful to a person planning an attack on Project infrastructure. Documents 18 through 22, as indicated in their titles, contain potential failure modes analyses that could serve as a roadmap for someone who seeks to identify Project weaknesses and the means of destroying a Project.

These documents also qualify for exemption under the Freedom of Information Act, 5 U.S.C. § 552 et seq. ("FOIA"). These documents were compiled for the purposes of the Commission's enforcement of the Federal Power Act for the comprehensive development and operation of hydropower projects and used to develop protocols to protect and alert threatened communities in coordination with state and local law enforcement agencies. These records constitute law enforcement documents under FOIA's Exemption 7, where release of the information "could reasonably be expected to endanger the life or physical safety of any individual." 5 U.S.C. § 552(b)(7)(F). These documents provide the type of dam safety information that is described in the U.S. Department of Justice's *Freedom of Information Act Guide* (May 2004) ("DOJ FOIA Guide") as qualifying for Exemption 7(F).² The DOJ FOIA Guide notes that FOIA was expanded in 1986 to include sensitive information that could prove dangerous if obtained by those seeking to do harm to the public on a large scale.³

Indeed, a court recently found Exemption 7(F) readily available to protect against disclosure of "inundation maps" that showed projected patterns in which downstream areas could be catastrophically flooded in the event of breaches in nearby dams. The court reasoned that releasing such information in the face of current homeland security concerns 'could increase the risk of attack' on one dam over another, and on such dam targets overall, because terrorists would be able to

¹ Documents 18-22 on the Request List are incorrectly identified in the County's description column as "PMFA" records. The correct abbreviation is "PFMA." The filing date for Documents 18-22 is also incorrectly identified. Documents 18-22 were filed in 2004. These PFMA documents are distinguishable from other documents on the Request List relating to "Probable Maximum Flood" ("PMF") analysis.

² The DOJ FOIA Guide is available online at <http://www.usdoj.gov/oip/foi-act.htm>.

³ DOJ FOIA Guide at "Exemption 7(F)."

use these maps to estimate the amount of damage and carnage caused by flooding.⁴

FERC affirmed this application of Exemption 7(F), finding that the inundation maps protected by the federal court are "very similar to information protected by the Commission in the hydropower area" and determining that "such information may appropriately protected under Exemption 7(F).⁵

2. Protection of Non-Public Documents (Documents 2, 5, 7-17).

As with Documents 3 and 4, each of the documents designated as "non-public" were issued by FERC's PRO, as indicated by the "submittal" categorization per the eLibrary database. *See Exhibit A.* PSE neither prepared nor transmitted these documents. The PRO is the appropriate entity to provide detail regarding the "non-public" designation of such documents. However, based upon PSE's review of the Request List, PSE agrees with FERC's non-public designation given the sensitivity of the information involved and the possible harm that could result from public access to such dam safety information.

3. The Sensitivity of These Documents, Combined With the County's Inability to Protect Such Documents Under Washington Public Disclosure Laws, Outweighs the County's Stated Information Need.

As noted above, the County's request includes a number of documents that contain sensitive CEII information. Your letter suggests that you will determine whether the information may be released subject to an appropriate non-disclosure agreement. Disclosure of these records to a public entity such as the County, even under a non-disclosure agreement, is subject to the Washington Public Disclosure Act, Chapter 42.17 RCW ("PDA").

⁴ *Id.* (citing *Living Rivers, Inc. v. U.S. Bureau of Reclamation*, 272 F.Supp.2d 1313, 1321-22 (D. Utah 2003) (finding inundation maps were protected under Exemption 7(F))).

⁵ *See* "Critical Energy Infrastructure Information," 108 FERC ¶ 61,121 (Aug. 3, 2004).

⁷ The PDA does not allow public agencies to examine the motive of the requester, except as provided under certain PDA exceptions. None of the exemptions apply to the instant requests, including the exemption for documents that pose certain terrorism threats. RCW 42.17.310(1)(ww) is narrowly tailored and only exempts "those portions of records assembled, prepared, or maintained to *prevent, mitigate, or respond* to criminal terrorists acts." (emphasis added.) Although the requested Project documents could be *used* in criminal terrorist acts, they were not assembled, prepared or maintained to *respond* to criminal terrorist acts. Rather, the documents were prepared to develop plans relating generally to dam safety and yet in the wrong hands may be used to facilitate criminal terrorists acts. We do not suggest that the County has any intent to facilitate improper use of the documents, but the County as a public agency could not prevent the disclosure of the documents to a member of the public by signing a non-disclosure agreement.

Washington's PDA provides that "[e]ach agency . . . shall make available for public inspection and copying all public records" unless the record falls within certain specific exemptions of the Act.⁷ RCW 42.17.260(1). A "public record" includes "any writing containing information relating to the conduct of government[.]" RCW 42.17.020(41). The County's requests indicate that the County seeks these documents in relation to its exercise of public safety and flood control operations. If these documents are provided to the County, they will be considered in the public domain as a public record and available to anyone who may request them from Skagit County. Therefore, a non-disclosure agreement would not provide the desired protection for CEII documents.

The County also cannot enter into a binding non-disclosure agreement with terms contrary to the PDA. "Contractual provisions which conflict with the terms of a legislative enactment are illegal and unenforceable."⁸ If the terms of a contract cause the County to violate another provision of state law, county code, or other public policy, the contract is outside of its powers and cannot be enforced. Disclosing CEII to public employees is tantamount to making the information publicly available.

FERC's standard CEII Non-Disclosure Agreement includes a clause requiring the recipient of CEII to agree that "[a]ccess to those [CEII] materials shall be limited to other Recipients of the identical information."¹¹ If the County enters into such an agreement, it will be promising to do something that it cannot do under state law. FERC cannot rely upon the County's ability to protect such information given the PDA requirements. Where, as here, a disclosure agreement would be ineffective even if executed by the requester, FERC should deny the CEII request.

This is particularly true in this instance because the County's request appears to be premature, the documentation is not necessarily relevant to the County's stated needs, and the County has other means of obtaining information. As noted above, the Part 12 study is currently in progress. The draft documents requested by the County may be presented in a different fashion in their final format and may eventually become publicly available. It is also unclear

⁸ *Machen, Inc. v. Aircraft Design, Inc.*, 65 Wn.App. 319, 333, 828 P.2d 73 (1992) (citing *Hederman v. George*, 35 Wn.2d 357, 212 P.2d 841 (1949)).

¹¹ See, e.g. *James Rumley*, 114 FERC ¶ 62,029 (2006) (paragraph 8); *John A. Scott*, 114 FERC ¶ 62,030 (2006) (paragraph 8).

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how outdated methodology reports, discussions on study preparation, and draft documents are relevant to the County's stated needs of providing for public safety and flood control. Furthermore, as we have in the past, we will continue to work with the County in a collaborative manner to assist the County in addressing its interest in flood control. Indeed, PSE has been, and continues to be, willing to provide the County with information through Project tours, telephone communications, and meetings. Other avenues that do not pose the at-large public disclosure risk presented in this CEII request are available for the County to reasonably obtain data that meets its stated needs.

Conclusion

Apart from Documents 1 (subject to limited CEII redaction) and 6, the documents requested are of such a sensitive nature that disclosure to the County—which, due to the operation of Washington State's public disclosure law equates to a release to the public at-large—poses an unreasonable risk to public safety and Project security. These draft reports provide substantial information on possible dam failure that could serve as a roadmap to public harm. Moreover, the conclusions of such ongoing dam safety assessments may ultimately be available to the County in the final reports. Therefore, the County's request is also premature and unnecessary to meet the County's stated need for the data. With the possible exception of Documents 1 and 6, the County's request for CEII and non-public documents should be denied.

Very truly yours,



Kendall J. Cammermeyer
Corporate Counsel

/enclosure

cc: Irena Netik
Chal A. Martin
David Brookings
Torey Nelson
Michael R. Stansbury

EXHIBIT A

Requested FERC CEII and Non-Public Documents (Per Skagit County Request List and eLibrary Data)

Doc #	Category/Accession Doc Date/Filed Date/Docket No.	Description	Class/Type
1	Submittal 20050912-0365 08/23/2005 09/01/2005 P-2150-000	Puget Sound Energy's Baker River Project Part 12 PMP/PMF Study Technical Memos 1 through 5 under P-2150. Availability: CEII	Report/Form / Part 12 Consultant Safety Inspection Reports
2	Issuance 20050809-0128 06/27/2005 06/27/2005 P-2150-000	Summary of the 6/27/05 Telephone Conference Call between David Lord and Representative of Puget Sound Energy discussing the Part 12 PMP/PMF Study for the Baker River Project under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
3	Issuance 20050825-0060 06/24/2005 06/24/2005 P-2150-000	Portland Regional Office's Dam Safety Report for Puget Sound Power & Light Co's Eighth Part 12 Report for the Lower Baker Development, Baker River Project under P-2150. Availability: CEII	FERC Report/Study / Other FERC Report/Study
4	Issuance 20050722-0315 06/24/2005 06/24/2005 P-2150-000	FERC's Dam Safety Report re Puget Sound Power & Light Co's Supporting Technical Information for the Lower Baker Development of the Baker River Project under P-2150. Availability: CEII	FERC Report/Study / Other FERC Report/Study
5	Issuance 20050722-0327 06/02/2005 06/02/2005 P-2150-000	Telephone Record between David Lord, FERC and Puget Sound Energy et al discussing the Baker River Project Part 12 PMP/PMF Study under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
6	Submittal 20050609-0034 05/26/2005 06/01/2005 P-2150-000	Puget Sound Energy submits the Board of Consultant's Report from the first Board Meeting held on 5/6/05 re its Baker River Project under P-2150. Availability: CEII	Report/Form / Part 12 Consultant Safety Inspection Reports
7	Issuance 20050712-0382 05/06/2005 05/06/2005 P-2150-000	PRO Telephone Record between David Lord, FERC and Representative of Puget Sound Energy et al discussing the Baker River Project - Board of Consultants Meeting for the Part 12 PMP/PMF Study under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
8	Issuance 20050608-0032 04/19/2005 04/19/2005 P-2150-000	Summary of the 4/19/05 Meeting re Puget Sound Energy's completing a new Probable Maximum Flood (PMF) study for the Baker River Project's Part 12 Report under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo

9	Issuance 20050608-0031 04/12/2005 04/12/2005 P-2150-000	Summary of the 4/12/05 Meeting re completing a new Probable Maximum Flood (PMF) study for Puget Sound Energy's Baker River Project Part 12 Report under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
10	Issuance 20050613-0109 03/29/2005 03/29/2005 P-2150-000	Summary of the 3/29/05 Telephone Conference Call between David Lord and Representative of Puget Sound Energy discussing completing of a new Probable Maximum Flood study for the Baker River Project under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
11	Issuance 20050420-0044 03/15/2005 03/15/2005 P-2150-000	Summary of the 3/15/05 meeting between David Lord, PRO and Puget Sound Energy discussing the review the Baker River Project's Part 12 PMP/PMF Study under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
12	Issuance 20050404-0007 02/22/2005 02/22/2005 P-2150-000	Summary of the 2/22/05 Meeting between David Lord of FERC's PRO & Tetra Tech of Puget Sound Energy regarding the Baker River Project Part 12 PMP/PMF Study under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
13	Issuance 20050404-0004 02/01/2005 02/01/2005 P-2150-000	Meeting Record of 2/1/05 telephone conference btw FERC, Puget Sound & Tetra Tech discussing the Baker River Project's Part 12 Probable Maximum Flood Study operated by Puget Sound Energy under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
14	Issuance 20050208-0074 01/20/2005 01/20/2005 P-2150-000	Meeting Record of the 1/20/05 meeting with Puget Sound Energy regarding the Baker River Project's Part 12 PMP/PMF Study under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
15	Issuance 20050208-0075 01/11/2005 01/11/2005 P-2150-000	Meeting Record regarding the 1/11/05 meeting with Puget Sound Energy regarding the Baker River Project's Part 12 PMP/PMF Study under P-2150. Availability: Non-public	FERC Memo / Internal Transmittal Memo
16	Issuance 20050128-0323 01/04/2005 01/04/2005 P-2150-000	Summary of Meeting-Telephone Conference of 1/4/05 discussing the completion of a new Probable Maximum Flood study for the Baker River Project under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
17	Issuance 20050114-0149 12/21/2004 12/21/2004 P-2150-000	Summary of the 12/10/04 telephone conference call between David Lord of PRO & Tetra Tech of Puget Sound Energy's regarding the Baker River Project Part 12 PMP/PMF Study under P-2150. Availability: Non-public	FERC Memo / Telephone Conversation or Electronic Mail Memo
18	Submittal 20041115-4055 Document Components 11/12/2004 11/15/2004 P-2150-000	Puget Sound Energy's CD containing Volume 4- Selected Drawings, PFMA Draft STI and Supporting Documentation for the Baker River Project under P-2150. E:LB DrawingsDrawings. Availability: CEII	Report/Form / Part 12 Consultant Safety Inspection Reports

19	Submittal 20041115-4054 11/12/2004 11/15/2004 P-2150-000	Puget Sound Energy's CD containing Volume 4- Selected Drawings, PFMA Draft STI and Supporting Documentation for the Baker River Project under P-2150. E:LB Drawings. Availability: CEII	Report/Form / Part 12 Consultant Safety Inspection Reports
20	Submittal 20041115-4052 Document Components 11/12/2004 11/15/2004 P-2150-000	Puget Sound Energy's CD containing Volume 2, PFMA Draft STI and Supporting Documentation for the Baker River Project under P-2150. E:LowerBaker. Availability: CEII	Report/Form / Part 12 Consultant Safety Inspection Reports
21	Submittal 20041115-4046 Document Components 11/12/2004 11/15/2004 P-2150-000	Puget Sound Energy's CD containing Volume 2, PFMA Draft STI and Supporting Documentation for the Baker River Project under P-2150. Availability: CEII	Report/Form / Part 12 Consultant Safety Inspection Reports
22	Submittal 20041115-4041 Document Components 11/12/2004 11/15/2004 P-2150-000	Puget Sound Energy's CD containing Volume I, PFMA Draft STI and Supporting Documentation for the Baker River Project under P-2150. Availability: CEII	Report/Form / Part 12 Consultant Safety Inspection Reports