

February 17, 2003

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504 – 7250

Re: Notice of Opportunity to File Written Comments
Pipeline Safety Chapter 480-93
Docket No. UG-011073

Dear Ms. Washburn:

Avista Utilities submits the following comments on the proposed changes to “WAC 480-93 Gas Companies – Safety” for review.

WAC 480-93-080 Welder and Joiner Identification and Qualification Certificates -
Avista would like to know why the 49 CFR 192 Appendix C requirements are not acceptable for pipelines operating with a hoop stress under 20% SMYS.

WAC 480-93-124 Pipeline Markers – Staff agreed with a 45 day timeframe in replacing line markers in its response in their Summary of Written Comments dated April 5, 2002. Also staff agreed with a 5-year record retention. The current revision does not reflect these agreements.

Avista Utilities would like to know what the basis for a separate line marker survey or patrol is. This should be combined with the existing patrols.

WAC 480-93-140 Meter Regulators – Avista would like a clarification on each start-up. What are you calling a start-up?

WAC 480-93-YYY Protection of Plastic Pipe - Avista Utilities would like to know what the basis for limiting item (1)(a) to 2 years. Why is it not based on the manufacturer’s recommendations?

Avista would also like to discuss the intent of item (5) in regard to backfill material and item (8) for backfilling prior to pressure testing.

WAC 480-93-185 Gas Leak Investigation – Avista would still like to see that the requirement for the odor sniff cards be deleted.

Avista would also like a clarification on the intent of why a Grade 1 or Grade 2 leak cannot be downgraded to a Grade 3 leak without a repair.

WAC 480-93-200 Reports associated with gas company facilities and operations – Avista would like to know why there are different reporting timeframes within this code and why the change from 6 to 2 hours. We do not feel that 2 hours is a sufficient timeframe to collect the necessary information for a telephonic report.

We appreciate the opportunity to be involved in this review process. We look forward to meeting with you in the future to continue work on this effort.

Respectfully yours,

Michael J. Faulkenberry, P.E.
Chief Gas Engineer, Avista Utilities